Missouri Registry Annual Report

Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri

Fiscal Year 2014



Missouri Department of Natural Resources
Division of Environmental Quality
Hazardous Waste Program

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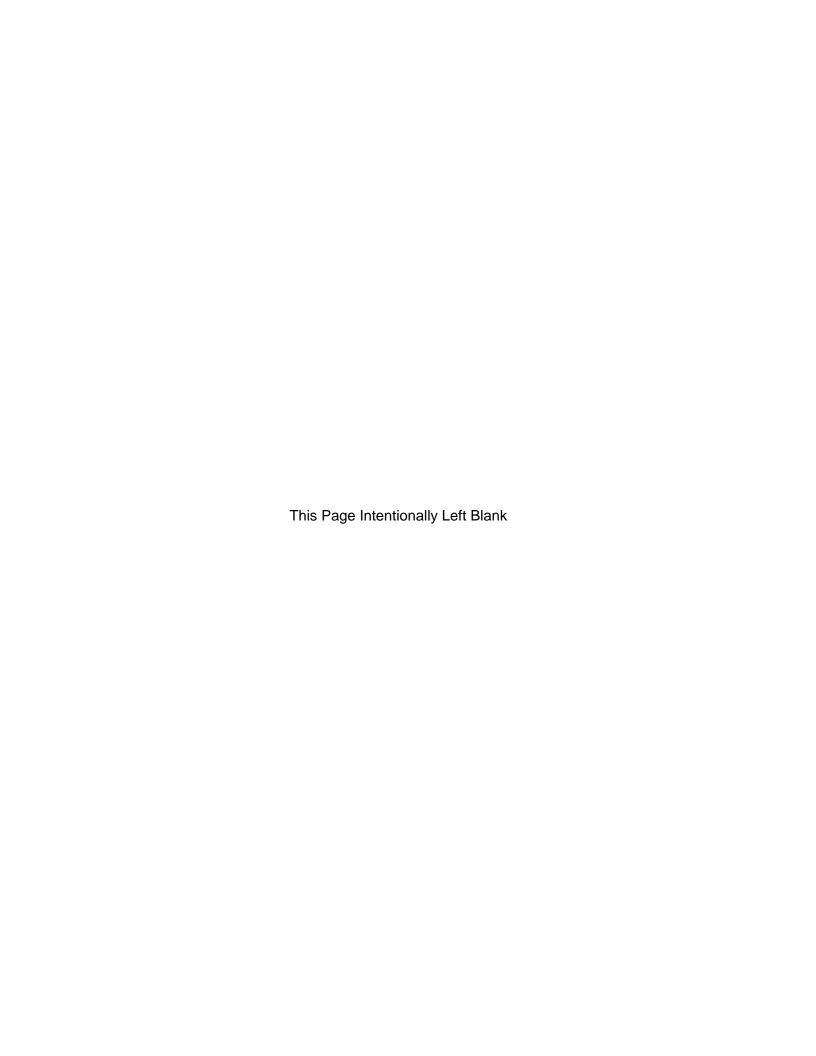
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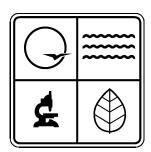
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Missouri Department of Natural Resources

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INTRODUCTION

In 1980, the United States Congress established the Comprehensive Environmental Response, Compensation and Liability Act, better known as CERCLA or "Superfund." This law was passed to respond to the indiscriminate disposal of the byproducts of industrial life, which contaminated soil and water and resulted in threats to public health and the environment. The federal statute provided both response and funding mechanisms for the remediation of hazardous substance disposal sites.

In June 1983, the Missouri legislature passed a state law to address these issues. The law directed the Missouri Department of Natural Resources (the department) to prepare a Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri (Registry). The law also authorized the establishment of emergency response activities to respond to hazardous substance releases; created a Hazardous Waste Remedial Fund for the implementation of these programs and other expenditures, such as financing the non-federal share of cleanups and the investigation and assessment of potential hazardous waste sites; and required that, each January, a full account of the Hazardous Waste Remedial Fund be reported.

During the 2005 legislative session, Senate Bill 225 was passed and signed into law by the Governor. One of the changes in SB 225 was to combine the Hazardous Waste Remedial Fund and the Hazardous Waste Fund together into the Hazardous Waste Fund, thereby changing the funding source for the Missouri Registry to the Hazardous Waste Fund. The legislation also eliminated the requirement for the department to file a report annually with the legislature on fund activities.

This annual report is published to comply with statutory obligations (Section 260.445 RSMo 1986, Missouri Hazardous Waste Management Law, see Appendix C). Missouri law requires the department to transmit a report each January 1 to the General Assembly and Governor regarding sites listed on the Registry. The statute also requires the report be provided to the Missouri Hazardous Waste Management Commission and the governing body of each county containing a Registry site.

In a broader sense, this report also provides an understanding of how the state and federal hazardous waste programs work together to provide financial, legal and technical aid for hazardous substance response and remediation in the state of Missouri.

REGISTRY AND REGISTRY PROCEDURES

REGISTRY OF CONFIRMED ABANDONED OR UNCONTROLLED HAZARDOUS WASTE DISPOSAL SITES IN MISSOURI (REGISTRY)

The Registry is a list of sites that contain hazardous waste. More than that, however, by law and regulation, it provides a variety of institutional controls that allow for residual contamination to be left on site after cleanup is completed while still protecting human health and the environment. These institutional controls include: deed notification of contamination, annual inspection, notice to buyer, change of use review, notice to the state if property is sold, cleanup and removal from the Registry, and public information about site location, classification of threat, contaminants, health concerns, public and private drinking water wells, and geology.

In addition, the information in the Registry notifies the public about property on the Registry and its associated hazards. It informs potential buyers about hazards and legal obligations that they may undertake if they purchase such property.

As defined in Hazardous Waste Management Law, RSMo 2002 Sections 260.350 to 260.430, the Registry is not intended or legally required to provide a comprehensive inventory of sites where hazardous chemicals and wastes have been disposed in Missouri. Instead, it is developed based on a specific legal mandate, which directs that sites be listed on the Registry if they are contaminated with hazardous substances that:

- A. Meet the legal definition of hazardous waste under Missouri's Hazardous Waste Management Law and Regulations. In practice, this means definitions that the state has incorporated by reference from federal statute, the Resource Conservation and Recovery Act of 1976 (RCRA) and would be subject to RCRA regulations. A waste is considered hazardous under RCRA if it meets either of the following criteria:
 - a. It is specifically listed or identified as a hazardous waste in the Code of Federal Regulations due to its composition and source, or
 - b. It exhibits one or more characteristics of a hazardous waste, which are ignitability, corrosivity, reactability or toxicity as determined by laboratory analysis.
- B. Were disposed of before regulation of such waste began in 1980 or disposed of illegally since that time: and
- C. Are present at concentrations above health-based screening levels.

Thousands of hazardous substances do not meet these stringent criteria or are exempted. Consequently, a large number of sites containing hazardous or toxic substances are not listed on the Missouri Registry. Examples of unlisted sites are:

- A. Sites contaminated with radioactive materials.
- B. Sites contaminated with polychlorinated biphenyls (PCBs).
- C. Sites contaminated with oil, gasoline or other "petroleum" materials (despite composition that would indicate listed hazardous wastes, such as benzene, xylene or toluene).
- D. Grain bins with pesticide contamination.
- E. Certain former manufactured gas plant sites with coal tar residue.
- F. Sites that have a chemical present in the groundwater but the department cannot determine how the chemical got there, such as solvents in groundwater where the source cannot be identified.
- G. Sites used for the disposal of fly ash waste, bottom ash waste, and slag waste.
- H. Sites used for the disposal of flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels.
- I. Sites used for the disposal of cement kiln dust waste.
- J. Sites used for the disposal of solid waste from the extraction, benefication and processing of ores and minerals (mining waste).

Each site on the Registry is described in detail in this annual report (starting on page 16) and includes the following information:

- A. A general description of the site, including the name and address, owner, and type and quantity of hazardous waste disposed there.
- B. A summary of any significant environmental problems at and near the site; and its proximity to private residences, public buildings or property, school facilities, places of work, or other areas where individuals may be present regularly.
- C. A summary of any serious health problems in the immediate vicinity of the site and any health problems deemed by the department to be related to conditions at the site.
- D. The status of any testing, monitoring or remedial actions in progress or recommended by the department; the status of any pending legal actions and any federal, state or local government permits; and the relative priority for remedial action at each site.

Within the department and the Missouri Department of Health and Senior Services (DHSS), a Site Assessment Committee evaluates the sites on the Registry and assesses classification changes. The Site Assessment Committee is composed of representatives from the department's Hazardous Waste Program, Water Protection Program, Environmental Services Program and Division of Geology and Land Survey. A fifth member represents the DHSS.

The members of the committee convene each fiscal year to analyze the Registry sites for potential for fires and explosions and for groundwater, surface water, soil and air contamination. Members of the committee draw upon their own special expertise when assessing the site. For instance, the DHSS representative is responsible for identifying the possible effects of contamination at a site on human health. The committee invites EPA representatives to provide comments on sites where the EPA is the lead agency.

In the past year, the Site Assessment Committee reassessed sites in the fiscal year 2013 report. Assessments are based upon the status of the site as of June 30, 2013, the end of the state of Missouri's fiscal year, and take into account new information about a site or remedial measures taken to reduce potential risk. If conditions at a site have changed over the past fiscal year, the committee may recommend a change in classification that better defines the threat to human health and the environment.

According to state Registry law, the sites are placed in one of the following categories:

Class 1: Sites that are causing or presenting an imminent danger of causing

irreversible or irreparable damage to the public health or

environment--immediate action required.

Class 2: Sites that are a significant threat to the environment--action required.

Class 3: Sites that do not present a significant threat to the public health or the

environment--action may be deferred.

Class 4: Sites that have been properly closed--require continued management.

Class 5: Sites that have been properly closed with no evidence of present or potential

adverse impact--no further action required. According to the state law, any

site classified as a Class 5 is removed from the Registry.

The relative need for action at each site is based solely upon the potential impact on public health and the environment. The type of action required, the feasibility of such an action, and its cost or benefit are not the primary factors in deciding whether action is needed.

REGISTRY PROCEDURES

The department investigates potential abandoned or uncontrolled hazardous waste disposal sites and identifies those that should be placed on the Registry. When the presence of hazardous waste is confirmed at a site, the department notifies the owner or owners that it intends to place the

property on the Registry. The notification is sent by certified mail to the owner's last known address 30 days before the site is to be listed on the Registry.

The owner or operator can appeal the proposed addition to the Registry. No site may be listed on the Registry until the appeal is resolved. If an appeal cannot be resolved through negotiation, the Missouri Hazardous Waste Management Commission may convene a public hearing. At least 30 days before the hearing, a notice of the event is published in a newspaper in the same county as the site. All final decisions of the Commission are reviewable under Chapter 536, RSMo.

To avoid Registry listing, a responsible party or site owner may remediate the site. State regulation 10 CSR 25-10.010 (2)(E) describes the process for remediation that includes timely efforts to characterize the site and complete cleanup actions by a Consent Agreement. The department will then suspend further actions to list the property on the Registry provided a consent agreement is signed within a reasonable time period. All activities are completed with state oversight.

If the owner does not want the entire property placed on the Registry, the listing may be limited to the contaminated portion of the property if the owner or operator submits a land survey performed by a licensed surveyor that includes the contaminated area plus a buffer zone in all directions. This allows the owner or operator unrestricted use of the portion of the property that is not contaminated.

When a site is placed on the Registry, the history of the property as a hazardous waste disposal area is filed with the Recorder of Deeds. If a site is properly closed, with no evidence of a potentially adverse impact, this finding is also filed with the Recorder of Deeds. These actions notify any purchasers of the property that the site is or has been on the Registry.

Once a site is placed on the Registry, it is subject to certain restrictions. The use of the site may not change substantially without the written approval of the director of the department. A change of use is considered substantial if it may result in the spread of contamination, increases human exposure to hazardous materials, increases adverse environmental impacts, or makes potential remedial actions to correct problems at the site more difficult. The seller must notify the buyer of the condition of the site prior to sale. Changes of ownership must be reported to the department within 30 days after the change.

Effective March 1, 1985, the Missouri Hazardous Waste Management Commission adopted regulation 10 CSR 25-10.010 pertaining to abandoned or uncontrolled hazardous waste disposal sites (see Appendix D). The regulation addresses the following topics:

- A. Placing sites on the Registry, petitions for deletion from the Registry, changes in site classification or modification of information;
- B. Appeals to the commission.
- C. Responsible party cleanups.
- D. Changes of use or transfers of site property.
- E. Recording of sites placed on or removed from the Registry.

Additional information on the Registry and Registry procedures is available at the department's Internet address, http://www.dnr.mo.gov/env/hwp/sfund/sfundregistry.htm

NPL SITES IN MISSOURI

The most serious of federal Superfund sites are placed on the NPL. This list is maintained and updated by the EPA. Federal and state officials work together to determine priority sites and submit candidate sites for inclusion on the NPL. The NPL lists the sites with the highest priority for further investigation under the federal Superfund Program. Candidate sites are ranked on a scale of 0 to 100, using a numerical scoring system known as the Hazard Ranking System (HRS). The HRS evaluates the threat a site poses to human health or the environment through contamination of soil, surface water, groundwater or air. Hazardous waste sites with a quality-assured HRS score equal to or greater than 28.5 are eligible for inclusion on the NPL. Sites for which the Center for Disease Control has issued a health advisory are also eligible, regardless of the HRS score.

As of June 30, 2014, Missouri has 33 sites on the NPL. Presented below is the list of the 33 Missouri NPL sites and the corresponding site information web link. Of these 33 sites, ten of the sites are listed on the Registry (Registry sites bolded). For EPA's National Priority List Sites in the Midwest – Main Page (links to pdf documents on NPL sites), please refer to the EPA's website at: http://www.epa.gov/region07/cleanup/npl_files/

NPL List Date: July 22, 2004

NPL List Date: May 10, 1999

NPL List Date: June 10, 1986

NPL List Date: October 14, 1992

NPL List Date: March 15, 2012

NPL List Date: October 4, 1989

NPL List Date: September 8, 1983

NATIONAL PRIORITIES LIST SITES IN MISSOURI (Alphabetical/Registry Sites are bolded)

1. Annapolis Lead Mine Annapolis, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0702917

2. Armour Road 2251 Armour Road North Kansas City, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0702515

3. Bee Cee Manufacturing Malden Industrial Park Malden, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701439

4. Big River Mine Tailings/ St. Joe Minerals Corp. Sec. 25, 26, 35 & 46, T. 37N, R. 4E Desloge, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701639

 Compass Plaza
 South Marshall St Rogersville, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0706143

6. Conservation Chemical Company 8900 Front Street Kansas City, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0700777

7. Ellisville Site 149 Strecker Road Ellisville, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701205

5

Federal Superfund Activities

National Priorities List Sites in Missouri

8. Fulbright Landfill

Bolivar Road

Springfield, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701153

9. Jasper County Site

NPL List Date: August 30, 1990

NPL List Date: September 8, 1983

Various Locations

Oronogo-Duenweg, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701290

10. Lake City Army Ammunition Plant

Junction Hwy. 7 and Hwy. 78 Independence, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701757

11. Lee Chemical

NPL List Date: June 10, 1986

NPL List Date: July 22, 1987

Hwy. 210 East of Hwy. 291

Liberty, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701378

12. Madison County Mines

NPL List Date: October 29, 2003

Fredericktown, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701102

13. Minker/Stout/Romaine Creek

NPL List Date: September 8, 1983

4037 W. Rock Creek Rd. and Swaller Rd.

Imperial, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701345

14. Missouri Electric Works

NPL List Date: February 21, 1990

S. Hwy. 61, 2 Miles South of Hwy. K

Cape Girardeau, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701474

15. Newton County Mine Tailings

NPL List Date: October 29, 2003

Various Locations

Newton County, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701651

16. Newton County Wells

NPL List Date: July 27, 2000

3900 Rangeline Road

Joplin, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0702514

17. Oak Grove Village Well Site

NPL List Date: September 5, 2002

NPL List Date: September 17, 1999

206 James Street

Oak Grove Village, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0700020

18. Pools Prairie
East of Hwy. 71 S., South of Alt. 71, and

West of Hwy. HH

Neosho, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0702918

19. Quality Plating NPL List Date: June 10,1986

Route 2

Sikeston, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701442

20. Riverfront Site NPL List Date: December 1, 2000

New Haven, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0702089

21. Solid State Circuits NPL List Date: June 10, 1986

Main Street

Republic, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701392

22. Southwest Jefferson County Lead NPL List Date: September 23, 2009

166 sq mi in SW quarter of Jefferson Co.

De Sota, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0705443

23. St. Louis Airport/HISS/Futura Coatings NPL List Date: October 4, 1989

Brown Road North of Airport

Hazelwood, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701210

24. Syntex-Verona NPL List Date: September 8, 1983

1st Street

Verona, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0700881

25. Valley Park TCE NPL List Date: June 10, 1986

Hwy. 141 North Meramec River

Valley Park, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701494

26. Vienna Wells NPL List Date: September 29, 2010

545-547 N. Chestnut Street

Vienna. MO

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0705803

27. Washington County Lead District-Furnace Creek NPL List Date: April 11, 2011

2 miles north of intersection of Big River & Hwy 21

Caledonia, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0705842

28. Washington County Lead District-Old Mines NPL List Date: March 19, 2008

Intersection of Hwys 21 & 47

Old Mines, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0705027

29. Washington County Lead District-Potosi NPL List Date: March 19, 2008

500 ft east of Bell St & Valley Rd

Potosi, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0705023

30. Washington Co. Lead District-Richwoods 21 acres in northeast Washington County Richwoods, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0705032

31. Weldon Spring Former Army Ordnance Works Hwy. 94, South of U.S. 40 Weldon Spring, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701773

32. Weldon Spring Quarry/Plant/Pits Hwy. 94, 2 Miles South of U.S. 40 Weldon Spring, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701753

33. West Lake Landfill 13570 St. Charles Rock Road Bridgeton, Missouri

http://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0701039

CLEANUPS

Registry Consent Agreements

Some owners whose property is proposed for the Registry would prefer to remediate a site to Class 5 rather than allow it to be placed on the Registry. Site owners or PRPs wishing to clean up a site may negotiate a Registry consent agreement. The consent agreement establishes a schedule and specific responsibilities for the completion of site investigation and remediation by the property owner or responsible party. All activities are completed with state oversight. Upon successful completion of site remediation, the department withdraws its Registry action.

As of June 30, 2014, 8 sites were undergoing responsible party cleanup under state Registry consent agreements. These sites are identified in the following list.

- 1. Emerson Electric 8100 W. Florissant St. Louis, MO 63136
- Joplin Pipe & Steel 506 Tyler Ave. Joplin, MO 64801
- Litton Systems
 4811 W. Kearney St.
 Springfield, MO 65803
- Missouri Metals
 9970 Page Blvd.
 Overland, MO 63132

Orbco (Orscheln)
 1177 N. Morley
 Moberly, MO 65270

NPL List Date: March 19, 2008

NPL List Date: February 21,1990

NPL List Date: July 22, 1987

NPL List Date: August 30, 1990

- 6. SKF Foundry 1801 W. Main St. Washington, MO 63090
- 7. Toastmaster Kirksville 1301 N. Osteopathy Kirksville, MO 63501
- TRW Manchester
 14161 Manchester Rd.
 Manchester, MO 63011

Cleanups 8 Consent Agreement

REGISTRY SITES REMOVED OR ACTION SUSPENDED

The following table lists sites that were removed from the Registry, or Registry action was suspended.

	Site	Address	Date Pro- posed for Registry	Date Regis- tered	Date Removed from Registry	Date Registry Action Sus- pended
1	Abrahamson Property	4044 West Rock Creek Road, Imperial, MO 63052	2/11/1984	6/14/1984	9/26/1986	NA
2	Acetylene Gas	3529 Hickory Street, St. Louis, MO 63104	9/25/1986	3/10/1987	2/12/1997	NA
3	Armco Union Wire Rope Plant	2100 Manchester Trafficway, Kansas City, MO 64126	7/27/1989	NA	NA	1/20/1993
4	Arneson Timber	Steelville, MO 65565	2/4/1999	7/1/1999	8/11/2009	NA
5		777 North Blue Hwy, Lee's Summit, MO 64063	12/27/1989	NA	NA	9/3/1992
6	Baxter Garden Center	17259 Wild Horse Creek Road, Chesterfield, MO 63005	8/26/1983	1/1/1984	2/18/1997	NA
7	Bemis Company	1295 North Highway Drive, Fenton, MO 63026	10/20/1987	NA	NA	6/17/2010
8	Boulder Valley Campground	Hwy AA, 4 miles SW of Hwy H, Syenite, MO 63640	4/18/1985	NA	NA	5/1/1985
9	Branson Quarry	Highway 65, 3 miles north of Branson, Branson, MO 65616	8/27/1983	1/5/1984	1/15/1991	NA
10	Bristol Steel	3117 South Big Bend Boulevard, Maplewood, MO 63143	1/19/1988	NA	NA	4/14/1991
11	Bubbling Springs Arena	1300 Romaine Creek Road, Fenton, MO 63026	8/26/1983	1/9/1984	9/18/1989	NA
12	Bull Moose Tube Company	406 Industrial Drive, Gerald, MO 63037	8/26/1983	NA	NA	2/5/1998
13	Burlington Northern Railroad – Cottrell Property	Hwy 19 N. of Cherryville, Cherryville, MO 65446	1/25/1996	3/25/1996	10/6/2000	NA
14	Burlington Northern Railroad - Crider Property	Hwy 19 & Becker, Steelville, MO 65565	1/30/1996	9/26/1996	8/1/2004	NA
	Burlington Northern Railroad – Richards Property	HC 86 Box 6151, Steelville, MO 65565	1/27/1996	NA	NA	8/29/2000
16	Burlington Northern Railroad – Wright Property	Hwy 19 1/2 mi. S. of Cherryville, Cherryville, MO 65446	2/9/1986	4/11/1996	10/31/2000	NA
17	Cashel Residence	2306 Romaine Creek Rd, Fenton, MO 63026	8/27/1983	NA	NA	10/4/1985
18	Castlewood (Sontag Road Swim Club & Fire Station)	1000 New Ballwin Road, Ballwin, MO 63021	8/26/1983	1/3/1984	11/1/1987	NA
19	Community Christian Church	623 Meramec Station Road, Man- chester, MO 63021	8/26/1983	NA	NA	2/5/1998
20	Cooksey's Barrel	Route 1, Village Ridge, MO 63089	8/27/1983	6/14/1984	4/19/1993	NA
21	Craft World International	603 W. Plainview Road, Springfield, MO 65807	4/5/1988	NA	NA	6/20/1989
22	Defiance Dump Site #1	Near 643 Old Colony Road, Defi- ance, MO 63341	8/27/1983	NA	NA	4/10/1984
23	Detroit Tool	100 Carr Street, Lebanon, MO 65536	3/12/1990	NA	NA	12/22/1995
	Dexter Plating	Arvin Road, Dexter, MO 63841	8/8/1986	NA	NA	9/3/1992
25	Dora Post and Lumber Company	Hwy 181, Dora, MO 65637	3/7/2003	4/18/2003	4/21/2008	NA
26	Dorman's Industry	Galmey on Highway 254, Galmey, MO 65779	6/18/1987	8/17/1987	2/1/2006	NA

	Site	Address	Date Pro- posed for Registry	Date Regis- tered	Date Removed from Registry	Date Registry Action Sus- pended
27	East North Avenue	East North Street, Williams Road, Eureka, MO 63025	2/9/1984	NA	NA	2/5/1988
28	East Texas Motor Freight	119 Douglass Street, St. Louis, MO 63147	6/24/1996	NA	NA	2/5/1998
29	Eggman Drum	6.4 miles south of the intersection of Routes 8 and 21, Potosi, MO 63116	3/7/1986	3/16/1987	12/28/1990	NA
30	Ellisville-Rosalie Property	Wildwood, MO 63011	8/27/1983	9/21/1984	9/8/1987	NA
31	Erwin Farm	1.5 mi N of Verona, Verona, MO 65707	8/27/1983	1/3/1984	10/9/1987	NA
32	Fire Trail 11-H	Steelville, MO 65565	5/17/1984	NA	NA	8/1/1984
33	Folk Avenue	7882 Folk Avenue, Maplewood, MO	2/9/1984	NA	NA	11/15/2007
34	Frontenac (Bliss Tank Farm)	German Boulevard and Dwyer Lots, Frontenac, MO 63131	8/26/1983	3/19/1990	3/30/1998	NA
35	General Electric/Enterprise Park	2401 Sunshine Street, Springfield, MO 65804	7/29/1985	NA	NA	3/3/1988
36	Generally Hauling	2.5 mi. E. off Route 47 on Route TT, St. Clair, MO 63084	6/10/1987	8/17/1987	11/2/1999	NA
37	Great Lakes Container Corp	42 Ferry Street, St. Louis, MO 63147	2/5/1988	NA	NA	6/27/1988
38	Grimco Signs	1 L and D Drive, Owensville, MO 65066	2/4/1988	NA	NA	1/5/1990
39	Hamill Transfer	3225 Chouteau Avenue, St. Louis, MO 63103	8/29/1983	9/3/1985	2/12/1987	NA
40	Hardt Road	18538 Hardt Road, Glencoe, MO 63021	8/27/1993	2/22/1985	12/1/1987	NA
41	Hellwig Fruit Stand	7800 Chesterfield Airport Road, Chesterfield, MO 63005	6/1/1990	NA	NA	5/12/1992
42	Hendren Salvage Yard	705 Proctor Drive, Columbia, MO 65202	1/23/1988	NA	NA	7/31/1988
43	Kem-Pest Laboratories	East of State Hwy 177, Cape Girardeau, MO 63701	3/17/1987	NA	NA	10/26/2000
44	King Adhesives	5231 Northrup Avenue, St. Louis, MO 63110	5/30/2002	6/23/2003	1/26/2006	NA
45	Kramer	2101 Old Bismarck Road, Park Hills, MO 63601	8/11/1989	NA	NA	4/10/1997
46	Lacy Manor Development (Sandcut Rd)	403 B Sandcut Road, Catawissa, MO 63016	8/26/1983	12/27/1985	10/28/1987	NA
47	Manchester United Methodist Church	Manchester, MO 63011	1/1/1984	1/1/1984	11/24/1992	NA
48	Minker/Stout/Romaine Creek	Jefferson	2/13/1984	6/14/1984	7/26/1999	N A
49		7101 North Market Street, Pagedale, MO 63133	6/10/1987	8/17/1987	8/27/1991	NA
5 0		1700 S. 2nd Street, St. Louis, MO	2/13/1984	NA	NA	4/10/1997
51	Motoroloa-Webb City	17th and West Hall Street, Webb	6/24/1986	NA	NA	6/29/2000
52	Nevada Landfill	Nevada, MO 64772	1/30/1986	NA	NA	12/4/1986
53	Parkhurst Mfg. Co.	2503 W Broadway Boulevard, Sedalia, MO 65301	8/29/1983	NA	NA	11/1/1983
54	Payne Residence	4038 Rock Creek Road, Imperial, MO 63052	8/27/1983	1/3/1984	10/1/1986	NA
55	Piazza Road/Bliss Farm	Rosati, MO 65559	8/26/1983	3/10/1987	12/28/1990	NA

	Site	Address	Date Pro- posed for Registry	Date Regis- tered	Date Removed from Registry	Date Registry Action Sus- pended
56	Plattco Landfill – Douglass property	Parkville, MO 64152	4/19/1985	NA	NA	7/15/1987
57	Private Drive Off Highway 100	Boone's Lane, JCT Hwy 100 & T, Glencoe, MO 63017	2/10/1984	6/14/1984	1/15/1988	NA
58	Quail Run Mobile Manor	East Highway 100, Gray Summit, MO 63055	8/26/1983	NA	NA	3/17/1989
59	Quality Metal Finishing- Commercial Ave	2055 N Commercial Avenue, St. Clair, MO 63077	8/14/2003	10/13/2003	3/2/2012	NA
60	Ray County Drum	2.5 miles east of Regal, Regal, MO 64035	5/25/1984	NA	NA	5/1/1985
61	Reeves Property	Fredericktown, MO 63645	5/20/1987	NA	NA	11/15/1993
62	Robbins Property	Route 3, Highridge, MO 63049	2/10/1984	6/14/1984	12/9/1992	NA
63	Roscoe	Roscoe, MO 64776	1/23/1989	NA	NA	4/27/2000
64	Rusha Farm	1 mi SW of Verona, Verona, MO 65712	8/27/1983	1/3/1984	9/8/1987	NA
65	Saddle & Spur Riding Club	Little Antire Creek Road, Highridge, MO 63049	8/27/1983	1/15/1984	8/9/1990	NA
66	Saline Creek Site	3/4 mi NE of Murphy, Murphy, MO 63206	8/27/1983	NA	NA	6/1/1984
67	Shenandoah Stables	Highway 61 South, Moscow Mills, MO 63362	8/30/1983	1/3/1984	8/21/1989	NA
68	Solid State Circuits -Boonville Road	616 Boonville Road, Springfield, MO 65806	7/12/1990	NA	NA	8/26/1996
69	Southern Cross Lumber	143 McDonnell Boulevard, Hazel- wood, MO 63042	8/31/1983	2/22/1985	3/9/1988	NA
70	Southwestern Bell/Eureka	Stonegate & Williams Roads, I-44, Eureka, MO 63025	3/17/1987	NA	NA	4/27/2000
71	Star Brite Plating-Joplin (Mid States Motor Carriers Inc.)	610 Tyler Avenue, Joplin, MO 64801	5/16/1990	NA	NA	4/27/2000
72	Star Brite Plating-Joplin	510 Tyler Avenue, Joplin, MO 64801	5/15/1990	NA	NA	8/5/2003
73	Stephens Farm	13688 Ozark Road, Neosho, MO 64850	3/8/1991	5/23/1991	1/4/1999	NA
74	Sullins Residence	1680 Romaine Creek, Fenton, MO 63026	8/27/1983	NA	NA	10/10/1985
75	Talley Farm	McKinley, MO 65705	2/8/1984	NA	NA	12/3/1985
76		Route MM, New Bloomfield, MO 65063	8/29/1983	1/1/1984	1/29/1989	NA
77	Times Beach	I-44 east of Eureka, Times Beach Disincorporated, MO 63025	3/5/1984	4/5/1984	4/28/1999	NA
78	TSI Mulberry Hill Road	Mullberry Hill Road, Barnhart, MO 63051	9/3/1983	1/3/1984	1/18/1991	NA
79	TWA (Ground Operations Center)	KCI Airport, Kansas City, MO 64153	10/14/1986	NA	NA	6/14/2001
80	Wheeler Property	107 East Pine, La Monte, MO	8/29/1983	NA	NA	9/17/1984

REGISTRY OF CONFIRMED ABANDONED OR UNCONTROLLED HAZARDOUS WASTE DISPOSAL SITES FISCAL YEAR 2014

An updated list of sites currently on the Registry is available at the department's Internet address, www.dnr.mo.gov, under hazardous waste topics.

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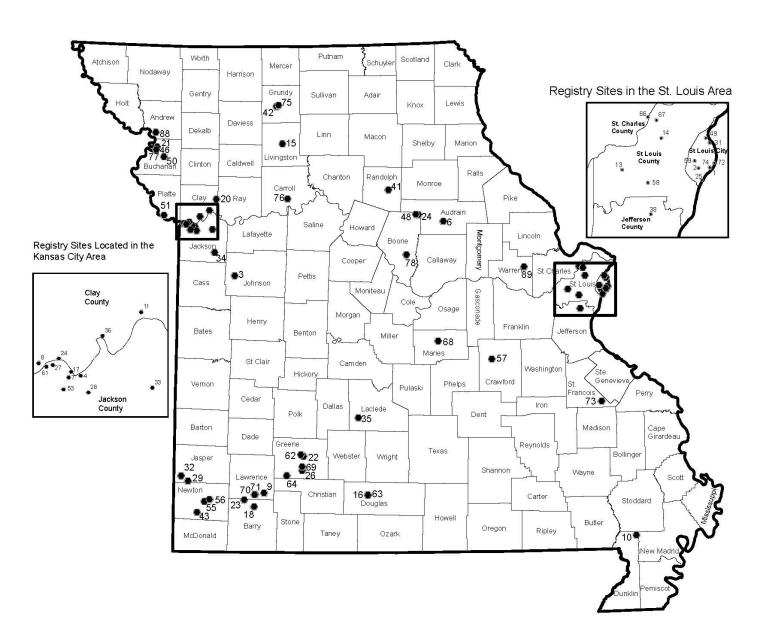
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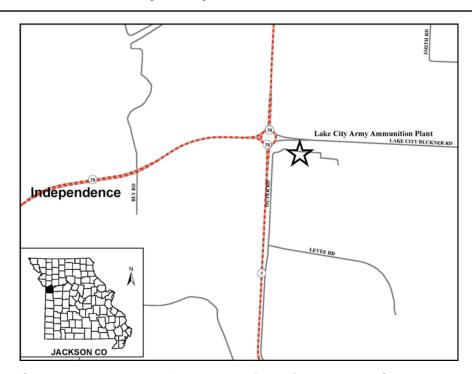
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CLASS 1 SITES

Lake City Army Ammunition Plant



<u>Site Name</u>: Lake City Army Ammunition Plant

Classification: Class 1

Date of Registry Placement: March 2, 2001

Date of NPL Listing: July 22, 1987

<u>Site Address</u>: The junction of Hwy 7 and Hwy 78 near Independence, Jackson County, Missouri.

<u>Present Property Owner</u>: The United States Government, Department of the Army

Lead Agency: EPA

Waste Type: Metals: antimony, arsenic, cadmium, lead, mercury, volatile organic compounds (VOCs): trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1,2-trichloroethane, vinyl chloride, 1,2-dichloroethene, 1,1,1-trichloroethane, toluene, Semi-volatile organic compounds (SVOCs): benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene Explosives: 1,3,5-trinitro-1,3,5-triazine (RDX), 1,3-DNB, 2,6-dinitrotoulene add lead styphnate and Trinitroresorcinal? Radioactives: Depleted Uranium (DU)

Quantity: Area 18 Operable Unit 1.3 to 2.2 million pounds VOC in subsurface Northeast Corner Operable Unit 0.74 to 1.5 million pounds VOC in subsurface. Other areas not estimated.

Site Description:

The Lake City Army Ammunition Plant (LCAAP) is a 3,935 acre government owned, contractor operated plant that began operation in 1941. It is the largest small arms ammunition plant in the nation. Industrial operations generated large quantities of potentially hazardous waste, including solvents; explosives; heavy metals such as barium, cadmium, chromium, lead, mercury and silver; and depleted uranium. Since 1941, the facility disposed of operational wastes in lagoons, landfills and burn pits located throughout the six-square-mile facility. Current disposal practices are in accordance with state and federal regulations.

In July 2002, the Missouri Department of Natural Resources (the department) approved a change of use request to construct driving courses and a parking lot for the Metropolitan Community College's Western Missouri Public Safety Training Institute. The Community College has decided not to construct the driving courses at LCAAP.

Environmental Problems and Areas of Concern Related to Site:

The site is located in a former channel of the Missouri River and flood plain. Groundwater, surface water and soil are contaminated with VOCs, explosives, and heavy metals. Contaminants associated with a groundwater plume in the Northeast Corner had previously migrated past the facility's boundary but currently is hydraulically contained onsite by a groundwater pump and treat system.

The Second Final Comprehensive Five Year Review covering the time frame from 2005 to 2009 was completed in March 2011. The Five Year Review process analyzed all data for all operable unit areas of concern. The Five Year review compared current status of the removal and remedial actions for the areas of concern as specified in the ROD and made a determination of the current and future protectiveness. All areas were determined to be protective in the short term however, four areas were determined to not be protective in the long term. The areas determined not to be protective in the long term are as follows: Area 3 (IWOU); Area 30 (IWOU), Area 16A (NECOU); Area 17B (NECOU). Recommendations were made for all areas. Area 17B in the NECOU has substantial issues with the operation and functioning of the remedy.

Another area that has been determined to be an environmental issue for the site is Building 83. Building 83 was a previous production building. This building was constructed around 1942 and used for the production of Trinitroresorcinal (TNR). TNR is the precursor to lead stephynate, an explosive propellant used in the production of ammunition. The process of producing TNR involves the use of various types of acids. During the time period this building was used for production, it is believed the fuming of the acid during the process carried explosive contamination into the porous areas and open conduits in the building structure. Once the material dried, it formed crystals in areas that were porous and contained open conduits. The building is now considered very dangerous with a high explosive potential. The contaminates of

concern for this building are asbestos; mercury; lead; PCBs; explosives. The building contains asbestos, both friable and non-friable the demolition of this building will be difficult. It was decided by EPA the building demolition would be a "Non Time Critical Removal Action (NTCRA)". An Environmental Evaluation and Cost Analysis (EE/CA) has been written and submitted for review.

Remedial Action at the Site:

LCAAP is divided into 34 areas of concern, which compose five operable units (OUs): the Northeast Corner OU, the Area 18 OU, Area 10 Sand Piles OU, the Installation-Wide OU, and building 83.

Northeast Corner OU (NECOU): The NECOU consists of Areas 11, 16, 17 and two RCRA Areas. A Record of Decisions for remedial action was signed in September, 2007. The remedies are implemented with the exception of 17B. The selected remedy for each of the Areas in the NECOU includes:

RCRA Areas: Waste Oil and Solvent Storage Facility and Paint and Solvent Waste Storage Facility – Surficial Soil – excavation and offsite disposal of surficial soil with chemicals of concern (COCs) that exceed cleanup goals. Institutional controls are required to maintain industrial land use.

Area 11 Burning Ground: Surficial soil – institutional controls are required to maintain industrial land use, Groundwater – monitored natural attenuation (MNA) for cyclonite (RDX) and perchlorate and institutional controls are required to prevent groundwater use and maintain industrial land use.

Area 16A Abandoned Landfill: Groundwater – MNA for semi-volatile organic compounds (SVOCs) and institutional controls to prevent groundwater use and maintain industrial land use, Groundwater seeps – groundwater seep monitoring to ensure compliance with cleanup goals, landfill cover inspection and maintenance, and institutional controls related to the landfill management (i.e. no construction of buildings on landfill) and to maintain industrial land use.

Area 16B Solvent Pits – enhanced reductive dechlorination (ERD) via an in-situ reactive zone (IRZ) in the source area, Groundwater-MNA, and institutional controls to prevent groundwater use, activities that could result in vapor exposure, and maintain industrial land use.

Area 16C (Old Firing Range), 16D (Old Burning Grounds), and 17C (Burning Pad) – surficial soil – lead hot spots excavation and consolidation with soil in Area 17D, Institutional controls are required to maintain industrial land use.

Area 17D Waste, Glass, Paint, and Solvents Area – focused excavation and consolidation of lead-impacted soil in areas susceptible to erosion; in-situ stabilization or excavation and offsite disposal of lead-impacted surficial soil with concentrations greater than 10,000 mg/ kg; vegetative cover of lead-impacted surficial soil exceeding the cleanup goal of 1,197 mg/ kg; vegetative cover over litter; litter removal; maintenance and performance monitoring of the PRW; ERD source treatment via IRZ; phyto-system to minimize surfacing of groundwater near the PRW and to provide hydraulic control of groundwater flow near the PRW; MNA; operation of Well 17-S; and institutional controls to prevent activities that could result in vapor exposure, prevent building/construction on soil covers, and maintain industrial land use.

Area 17B Oil and Solvent Pits – ZVI source treatment via deep soil mixing; maintenance/ repair of the existing vegetative cover to minimize infiltration; ERD source treatment via IRZ; MNA within source area to monitor ongoing ERD processes; sentinel/monitoring wells to monitor for NAPL migration; MNA of downgradient groundwater VOC plume; ERD via IRZ barrier to prevent migration of VOC plume to the paleochannel and increase rate of plume degradation; and institutional controls.

Area 18 OU: Area 18 consists of a series of oil and solvent pits and burn areas where a large quantity of spent solvents and other wastes were disposed. The Record of Decision was amended and signed in September 2007.

In support of the ROD amendment, additional investigation activities were conducted to further the understanding of the nature and extent of contamination. Impacts to the environmental changed significantly for surface soil and VOC source area mass. The volume of surface soil with lead above the cleanup goal increased from 4,700 cubic yards (CY) to approximately 9,700 CY. The VOC contaminant mass in the source area increased from less than 50,000 pounds (lbs) delineated to only 20 feet below to a lowrange estimate of more than 1,000,000 lbs delineated to approximately 30 feet bgs. The dominant factor in the increase of VOC mass estimated to be present in Area 18 OU is the presence of non-aqueous phase liquid (NAPL) in the shallow VOC source areas.

The remedies for Area 18 OU are currently being implemented and are as follows:

Focused in-situ stabilization of lead-impacted surface soil:

Installation of in-situ reactive zone (IRZ) barriers in the paleochannel downgradient of each VOC source area to contain the source;

Focused soil excavation, installation of NAPL recovery wells, monitored natural attenuation (MNA), and IRZ treatment in the VOC source areas:

Installation of a vegetative cover to limit the potential for exposure to lead-impacted surface soil and impacted soil in the VOC source areas;

Continued operation and optimization of the existing on-site groundwater extraction and treatment system and MNA of groundwater.

Land Use Controls (LUCs) to limit the potential for exposure to lead-impacted surface soil and impacted soil and groundwater in the VOC source areas. The Interim Remedial Action Completion Report, IRACR has been finalized for Area 18 and the IWOU.

Installation-Wide OU (IWOU): The IWOU encompasses the remainder of the facility (about 30 Areas of Concern) except for the Area 10 Sand Piles and Area 27 (active firing

range). As part of the Housekeeping Engineering Evaluation/Cost Analysis (EE/CA) EE/CA UXO was found located with the solid waste piles in AOC 31. The UXO was identified as 81-mm mortar rounds. The Army stopped all work in AOC 31 with the discovery of the UXO to develop a screening plan for the remaining waste material. Over 350 81-mm mortar rounds where found and removed from the remaining waste pile and excavation footprint. None of the rounds discovered were fused or live. During the UXO screening operation, the Army also found several projectile bodies from the Davy Crockett Spotter Rounds (i.e., contain depleted uranium) within the solid waste pile. A radiological screening of the waste pile found five additional projectile bodies. After the radiological screening the remaining waste pile was hauled off to a local sanitary landfill. Confirmation samples verified that AOC 31 had been cleaned up to the selected cleanup goals for the Housekeeping EE/CA.

The ROD was signed in 2008 and the selected remedies are as follows:

Area 2: Focused soil excavation and off-site disposal of lead-impacted soil to prevent potential exposure to site and construction workers and to prevent potential leaching to groundwater.

Area 3: Vegetative cover and land use controls (LUCs) to prevent potential exposure of polynuclear aromatic hydrocarbons (PAHs) and metals-impacted soils to human and ecological receptors.

Area 9: Focused soil excavation and off-site disposal of lead- and trichloroethene (TCE)-impacted soil to prevent potential exposure to site workers.

Area 13: Focused soil excavation and off-site disposal of metals-impacted soil to prevent potential exposure to site workers.

Area 23: Implementation of LUCs to protect construction/utility workers from potential exposure to manganese in wind-blown fugitive dust.

Area 30: Vegetative cover and LUCs to prevent potential exposure of metals-impacted soils to human and ecological receptors.

Area 34: Focused soil excavation and off-site disposal of metal and explosive-impacted sediment to prevent potential exposure of sediment to ecological receptors and to prevent potential leaching to groundwater.

Areas 4, 7, 13, 15, 19, 21 and 33: LUCs are necessary to prevent exposure to contaminated soil associated with inactive sumps that are located next to production buildings or areas that prohibit removal of the sumps at this time. The following sumps require future work and will be addressed as they become available through maintenance or construction activities, or at installation closure or transfer: 1SU2, 3SU3, 33CSU1, 33DSU1, 34BSU1, 34DSU1, 52ASU1, 52BSU1, 97ASU2, and 136ASU1. In addition, five inactive sumps at Area 13 have been abandoned beneath buildings (35SU10 through 35SU14). These sumps are presumed to have been filled or removed during construction activities and were not addressed as part of the Removal Action. If in the future it is determined that these sumps require additional work, they will be addressed as access to them becomes available due to construction, maintenance, or at Installation closure or transfer.

IWOU-Wide Groundwater: Monitored natural attenuation (MNA), LUCs, groundwater extraction and ex-situ treatment, and installation of an in-situ treatment system at Area 12 via enhanced reductive dechlorination (ERD) to prevent potential exposure of human receptors to groundwater. The Interim Remedial Action Completion Report (IRACR) was finalized in July 2010.

Area 10 Sand Piles OU: The Area 10 Sand Pile was originally slated to be remediated under a Nuclear Regulatory Commission (NRC) Decommissioning Plan. Due to the underestimation of waste material. the project did not receive the required funding. The NRC deferred regulatory oversight to U.S. EPA Region 7 and the state. Major contaminants of concern include depleted uranium, lead and unexploded ordnance. The Federal Facility Agreement Parties agreed to make Area 10 Sand Piles a separate operable unit. In 2005, the US Army, USEPA and MDNR concurred on the decision to pursue a Non-Time-Critical Removal Action. This was determined to be the appropriate means of addressing chemical and radiological contamination at LCAAP Area 10. In October of 2005 the US Army issued the Area 10 Sand Piles Engineering Evaluation/Cost Analysis (EE/CA). This document presented the basis for the proposed removal action by characterizing the current site conditions and associated risks. evaluating potential removal action alternatives, determining cleanup levels and recommending a suitable removal action approach to address the lead and depleted uranium (DU) impacted sand and soils. In January of 2008, an Explanation of Significant Difference (ESD) was prepared to document a revised clean-up level for lead consistent with LCAAP site-wide cleanup level under an industrial scenario. A Revised Final Area 10 Sand Pile Action Memorandum was issues in August 2008 to document regulatory approval of both the Non-Time Critical Removal Action outlines in the EE/CA and the final cleanup level for lead under an industrial scenario. The removal action was completed by December 31, 2008, on the bullet catcher sand piles addressing radioactive materials required as part of the decommissioning activities and nonradioactive constituents. A Removal Action Completion Report and Final Status Survey were completed in June and March of 2009. The material has been hand sorted and the UXO hydrocut to render it nonexplosive. All other waste streams from the sorting and cleanup process have been shipped and disposed. The site has requested an amendment to their Nuclear Regulatory Commission license.

Building 83: Another area has been determined to be an environmental issue for the site is Building 83. The building has been added as an additional operable unit (OU #5). Building 83 was a previous production building, constructed around 1942 and used for the production of trinitroresorcinal (TNR). TNR is the precursor to lead stephynate, an explosive propellant used in the production of ammunition. The process of producing TNR involves the use of various types of acids. During the time period this building was used for production, it is believed the fuming of the acid during the process carried explosive contamination into the porous areas and open conduits in the building structure. Once the material dried, it formed crystals in both accessible and

inaccessible areas, making remediation difficult. The building is considered very dangerous with a high explosive potential. The contaminants of concern for this building are asbestos; mercury; lead; PCBs; explosives. The building contains asbestos, both friable and non-friable. The demolition of this building will be difficult. It was decided by EPA that the building demolition would be a "Non-Time Critical Removal Action (NTCRA)." An Environmental Evaluation and Cost Analysis (EE/CA) has been written, submitted and reviewed. As a result of regulatory review and comment, pilot studies are in progress to determine the best practice for removal of the characteristic of explosivity from building materials and equipment. Once the pilot studies are completed a decision will be made on how to proceed with the process.

General Geologic and Hydrologic Setting:

The site is located near the boundary between the Osage Plain and Dissected Till Plains of the Central Lowland Physiographic Province. The surface topography in the vicinity of the plant consists of rolling uplands traversed by broad stream valleys and flood plains of the Missouri River, the Little Blue River and an abandoned Missouri River channel. The majority of the active manufacturing areas are situated in the topographically flat portion of the site. Surface water draining from the western portion flows to West Fire Prairie Creek and eventually into the Little Blue River. Surface drainage from the eastern portion flows to East Fire Prairie Creek and eventually into the Missouri River.

At the highest elevations, limestone of the Pennsylvanian-age Kansas City Group is the predominant bedrock. Underlying side slopes, shale and claystone with lesser amounts of limestone of the Pennsylvanian-age Pleasanton Group dominate. Bedrock beneath the alluvial channel is limestone of the Pennsylvanian-age Marmaton Group. Soils overlying bedrock in the upland area range in thickness from two to five feet and typically are composed of silty clay and silt. In the central and northern parts of the installation the soils are composed of silty clay and silt about five feet thick. Pleistocene-age alluvial deposits of silt, clay, sand and gravel fill the abandoned Missouri River channel to

depths up to 90 feet.

The principal aguifer of Lake City and the site area is the unconsolidated Pleistocene-age alluvial deposits, specifically the coarse sand and gravel in the lower 40 to 70 feet. located in the abandoned Missouri River channel. Lake City residents and the site use the alluvial aquifer for basic drinking and industrial water needs. The pumping of production wells has altered the natural groundwater flow patterns. The non-pumping groundwater flow directions were reported to have been to the east and west with a groundwater flow divide near the central portion of the site. Recent potentiometric data indicate an apparent northwest-southeast groundwater flow divide located along the eastern quarter of the abandoned Missouri River channel. West of the divide, groundwater flows in a generally westward direction (influenced by site pumping) within the abandoned channel.

Across the site, the average depth to the water table is five feet below the ground surface in the alluvial flats. The average depth to the water table in the uplands is seven feet below the ground surface. The site alluvial aquifer is in hydraulic connection with the Little Blue River alluvium and the Missouri River alluvium. The principal concern is the potential for lateral off-site migration of hazardous wastes through the alluvial materials. Groundwater in the Pennsylvanianage bedrock underlying the site is a minor component of the overall regional groundwater flow regime.

Public Drinking Water Advisory:

The Public Drinking Water Program has a record of 22 wells on site. Twelve are used to supply drinking water to the facility. The number of contaminant sources around the plant and the number of conduits to groundwater leave the drinking water supply at a very high risk of contamination.

Health Assessment:

The Lake City Army Ammunition Plant (LCAAP) site is located in Jackson County, Independence, Missouri, within the Missouri River floodplain. It is an active government owned, contractor-operated plant that extends

approximately seven square miles. Except for a five-year period following World War II, the plant has operated since 1941. It is the largest small arms ammunition manufacturing plant in the United States. The facility, which consists of thirty-four areas of concern. has five operable units. The operable units, have generated large quantities of potentially hazardous waste, including solvents, explosives, asbestos, depleted uranium and heavy metals, such as antimony, barium, cadmium, chromium, lead, mercury, silver, and arsenic. Since 1941, the facility has been disposing of operational waste on-site in various locations in lagoons, landfills, and burn pits. The Northeast Corner Operable Unit (NECOU) consists of areas 11, 16, and 17.

Three distinct contaminated groundwater plumes have been identified, one of which previously had migrated past the facility's boundary but currently is hydraulically contained onsite due to an in place remedy of pump and treat. Remediation activities are complete in Area #10. Vegetation has been reestablished in Areas #10 and #18. The following are the major contaminants of concern found in surface water, groundwater or soil at the site: antimony, arsenic, benzo(a) anthracene, benzo(a)pyrene, benzo(b) fluoranthene, benzo(k)fluoranthene, cadmium, 1,2Qdichloroethene, 1,3-DNB, lead, tetrachloroethylene (PCE), toluene, 1,1,1trichloroethane, 1,1,2-trichloroethane, trichloroethylene (TCE), vinyl chloride and 1.3.5-trinitro-1.3.5-triazine (RDX). Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants. A Technical Impractibility Waiver (TI) presented to DNR and EPA Region VII for the NECOU source area and additional area extending from the source area to the edge of the paleochannel (IRZ line 1 to 4) was declined by EPA headquarters. Instead the EPA suggested the army focus on removina

contaminant mass from these source areas.

Remedy design for the NECOU was found to have issues injecting the designed amount of molasses due to the area soil geology. A pilot study with the objective of increasing the volume by increasing the pressure, is being conducted for each injection well with some of

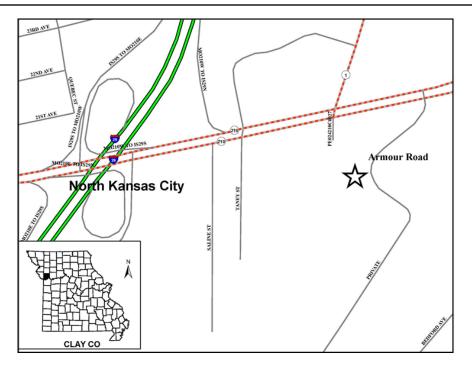
the injection wells being replaced due to fracturing. The pilot study was minimally successful. A few of the wells were able to receive more fluid however, it appears some of them may have fractured allowing for more material to be injected but also moving contamination to areas that weren't previously contaminated. Due to the lack of ability to fully implement the remedy as designed, the long term protectiveness of the remedy is in question. The current remedy as designed may not be able to meet the groundwater cleanup goals within a reasonable timeframe.

Due to the toxicity of the hazardous chemicals, surface soil, subsurface soil and groundwater contamination, a health risk exists at this site. Groundwater and private well monitoring to determine the extent of the off-site migration of hazardous wastes will enable health officials to determine potential human exposure. Private well monitoring from 2004 through 2012, found no wells with contamination above the established standards. However, due to the number of contaminant sources around the plant and the number of conduits to groundwater, the risk of contamination to drinking water supply remains very high. The Public Drinking Water Program has a record of 22 wells on site. Twelve are used to supply drinking water to the facility.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

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CLASS 2 SITES



Site Name: Armour Road

Classification: Class 2

Date of Registry Placement: May 22, 1997

Date of NPL Listing: May 10, 1999

<u>Site Address</u>: 2251 Armour Road, North Kansas City, Clay County, Missouri, Sec. 13, T. 50N, R. 33W North Kansas City Quadrangle. 39°08'42" North, 4°33'21"

<u>Present Property Owners</u>: Kansas City 1986 Limited Partnership, Donald E. Horne, Principal Partner

Lead Agency: EPA

Waste Type: Arsenic, pentachlorophenol (PCP), antimony, 2,4-dichlorophenoxyacetic acid (2,4-D), and other contaminants resulting from herbicide blending operations [including benzo(a)pyrene, cadmium, dichlorophenol, lead, mercury, selenium, thallium, 2,4,5-trichlorophenoxyacetic acid (2,4,5-T) and 2,4,6-T)

Quantity: The quantity of building material removed and disposed during the demolition action in 2004 was approximately 1400 tons.

The quantity of contaminated soil that was excavated, treated, and disposed was about 70,000 tons. The quantity of contaminated groundwater is unknown but may range into the billions of gallons.

Site Description:

From 1943 to 1983 this property was the location of a herbicide blending facility that used the following chemicals: arsenic; pentachlorophenol (PCP); sodium chlorate; 2,4-dichlorophenoxyacetic acid (2,4-D); and 2,4,5-trichlorophenoxyacetic acid (2,4,5-T). Herbicides were used to control weed growth along railroad right-of-ways. The facility has been inactive since 1986.

The soil was contaminated with extremely high levels of arsenic and lower levels of numerous other substances. Groundwater is also contaminated. This contamination is believed to be a result of spills and general operational practices at the facility. The 25,000 square foot building, demolished in 2004, was also contaminated.

The site, which covers 1.8 acres, is located between an industrial area and a residential neighborhood. The property is adjacent to rail yard warehouses, industrial facilities and a

commercial development zone. Homes are about 1200 feet away.

Environmental Problems and Areas of Concern Related to Site:

The Missouri River alluvial aguifer that underlies the site has been contaminated. Analytical results from Missouri Department of Natural Resources' (the department) sampling in June 1990 documented the presence of characteristic hazardous waste in the soil and groundwater. The analyses also documented the presence of hazardous waste constituents in the groundwater above Missouri Department of Health and Senior Services' (DHSS) safe levels set for the site. Wells near the site draw water from the aguifer for industrial use. A well, located 0.25 miles to the southeast of the site, was removed from service due to arsenic contamination.

Remedial Actions at Site:

In April 1996, the U.S. Environmental Protection Agency (EPA) implemented a timecritical removal action. The removal action included covering exposed soil on the property with geofabric and gravel and placing a 6-foot high, chain-link fence at the south and east borders of the site. The geo-liner that was placed over the exposed soil is now in poor condition in certain areas. In December 1996, the EPA entered into an agreement with one of the Potentially Responsible Parties to conduct an Engineering Evaluation/Cost Analysis of available soil-cleanup alternatives. A treatability study that evaluated electrokinetics for removing arsenic from soils resulted in rejection of that technology as a cleanup alternative. The site was added to the EPA's National Priorities List in May 1999.

EPA finalized a consent decree with Borax to conduct a non-time critical removal action, effective June 3, 2004. The removal action was initiated in September 2004, and started with the demolition and off-site disposal of the building and other structures.

After completion of building demolition and offsite disposal, excavation of contaminated soils began in spring 2005. Soils were

excavated up to or close to the site boundaries, to a depth averaging about 23 feet. Soils were treated with lime and ferric sulfate to meet leachability requirements. Treated soils were disposed at a local Subtitle D landfill.

Excavation actions were completed in early 2006, and site restoration actions were completed in spring 2006. Two hundred tons of pure arsenic were removed during the excavation action with a 96% estimated percent removal of source arsenic. Several site studies were performed prior to 2006 by the EPA, the Department and U.S. Borax to reveal that soil at the Site was contaminated with arsenic, and to a lesser degree, by pentachlorophenol, 2,4-D, and 2, 4, 5-T. These studies also revealed that groundwater near the Site were impacted by these constituents due to being present in the soil. Removal of soil from the Site in 2006 appears to have resulted in a significant decline in the concentration of arsenic in the shallow groundwater interval compared to data from before the removal of soil was conducted. In the shallow groundwater there was a decline from a pre-Removal Action arsenic concentration of almost 400,000 µg/L to concentrations in the range of 73,000 µg/L to 98,000 µg/L. Monitoring data after the excavation also revealed that PCP, 2, 4-T and 2, 4, 5-T concentrations declined to nondetect levels compared to the concentrations that had been detected in groundwater during the initial Site investigations conducted in the 1990's. As a result of these findings, the principle objectives of the RI/FS was to: 1) focus on groundwater monitoring to define the extent of arsenic in groundwater, 2) determine hydrogeological properties of the groundwater for later use in the feasibility study, and 3) determine the trends in groundwater arsenic concentrations since the Removal Action was completed.

On April 9, 2010, the Consent Decree (CD) for activities to be completed in the Remedial Investigation/Feasibility Study (R/FS) was logged into court, which is the effective date to begin work on the RI/FS. The CD required data gathering at and from surrounding areas of the Site to the extent necessary to complete the RI/FS. The final RI report was completed

In September 2012. The work performed during the RI consisted of the following: installing 16 groundwater monitoring wells for a total of 32 wells; sampling and analyzing groundwater samples from the monitoring wells over seven quarters; collecting soil samples from the perimeter areas of the Site; performing hydraulic conductivity testing on water bearing formations beneath and down gradient of the Site; determining the fate and transport of arsenic in groundwater; conducting a local area ecologic habitat evaluation; conducting a risk assessment for ecological and human health receptors; and identifying contaminant-specific and location-specific Applicable or Relevant and Appropriate Requirements (ARARs) for arsenic as identified by the risk assessment. Soil samples were also collected as part of the RI effort from the following areas: regional background; background samples along the railroad tracks adjacent to the Site; along Railroad Avenue; south drainage ditch; off-Site ditch along Railroad Avenue; and regional outfall basin that collects stormwater from the local area and Site.

In August 2010, while conducting the studies required by the RI of the Site, elevated concentrations of arsenic were discovered at the ground surface along portions of Railroad Avenue. In December 2010 a removal action was conducted to remedy the potential exposure to the arsenic along Railroad Avenue. The removal action consisted of removing soil to a depth of approximately one foot and covering the area with filter fabric and gravel.

The RI was completed in March 2013. Following completion of the RI, a Feasibility Study (FS) work plan was prepared to define the work to be performed for conducting the FS. It is expected that the draft Detailed Analysis of Alternatives, Comparative Analysis, and the Institutional Controls Memorandum (all as combined report) will be completed in August of 2014, after which the draft FS will be prepared for agency review.

General Geologic and Hydrologic Setting:

The Armour Road Site, located on an alluvial point bar on the north shore of the Missouri

River, is characterized by 17 to 22 feet of silty clay interbedded with fine-grained sand and silt lenses. These materials are underlain by fine-to medium-grained sand to a depth of at least 55 feet. This sand interval within the Missouri River alluvial aquifer is saturated from a depth of 25 feet. Due to the thick alluvial cover, bedrock is not exposed. However, the underlying bedrock is of the Pennsylvanianage Kansas City Group, which is 60 to 85 feet below the ground surface.

Groundwater at the site flows southeast through the permeable sand, discharging to the Missouri River. The Missouri River alluvial aquifer is widely used in this area.

Public Drinking Water Advisory:

Five alluvial wells serving North Kansas City are about one mile west of the site. Eleven alluvial wells and an intake on the Missouri River serving Kansas City are about 1.5 miles northwest. Five alluvial wells and one proposed well serving Gladstone are 2.5 miles to the northwest. The city of Independence has 35 active wells and six proposed wells about eight miles east of the site. All of these wells are between 100 and 150 feet deep. None of these wells are presently impacted by the Armour Road Site. However, the site impacts groundwater that is a potential drinking water resource in this area where the alluvial aquifer is highly used.

Health Assessment:

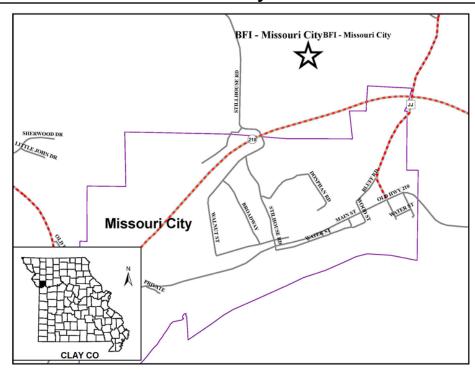
The primary contaminant of concern at the site is arsenic. Additional contaminants found in lower levels at the site included 2,4-dichlorophenoxyacetic acid (2,4-D); 2,4,5-trichlorophenoxyacetic acid (2,4,5-T); 2,4,6-trichlorophenol (2,4,6-T); pentachlorophenol (PCP); antimony; mercury; lead; selenium; thallium; benzo(a) pyrene; cadmium; and dichlorophenol. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential health effects associated with these contaminants.

During the previous removal action, the majority of soil contamination was removed from the site; however, limited arsenic contamination remains in subsurface soil at

property boundaries, and in limited areas in surface and subsurface soil a short distance beyond the property boundaries. An RI/FS is currently being conducted to address the remaining soil contamination and the groundwater contamination. Currently, exposure to the contaminated groundwater is not expected because there are no wells presently impacted by the site. For soil, since the soil contamination onsite is in the subsurface, unless excavation were to take place, no exposures to the remaining onsite contamination are expected to occur; however, there is contamination offsite in surface soil where limited exposures may occur. The site needs to be monitored until the current remediation process is completed and the threat to human health has subsided.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

BFI - Missouri City Landfill



<u>Site Name</u>: BFI - Missouri City Landfill

Classification: Class 2

<u>Date of Registry Placement</u>: January 1, 1984

<u>Site Address</u>: 8501 Stillhouse Rd, Liberty, Missouri 64068. SE 1/4, NE 1/4, NW 1/4, and SW 1/4, NW 1/4, NE 1/4, Sec. 8, T. 51N, R. 30W, Missouri City Quadrangle

<u>Present Property Owner</u>: Browning Ferris Industries Waste Systems of North America, Inc. (BFI), and Operated by Republic Services, Inc.

<u>Lead Agency</u>: DNR - Resource Conservation and Recovery Act (RCRA) post-closure and corrective action lead

<u>Waste Type</u>: Solvents, herbicide wastes, organophosphates, waste acids, waste oils, industrial wastewater treatment sludge, paint sludge, and heavy metals sludge

Quantity: Not determined

Site Description:

Located on a bluff above the Missouri River, the site consists of about 200 acres of which the southern 90 acres were used for waste management activities. The site was originally developed as a sanitary landfill. Additional industrial waste disposal trenches were constructed, filled and closed after Browning-Ferris Industries of Kansas City Inc. (BFI) leased the site in 1972 from Lincoln Brothers Land, Inc. BFI operated the facility from November 1972, until September 1983.

Waste management facilities included a sanitary landfill, a chemical processing center where bulk liquid wastes were received for temporary storage prior to treatment by fixation units, gelatin basins, seven bulk sludge disposal trenches, a chemical landfill, a wastewater treatment pond, a stormwater retention pond, and sludge drying beds. At least 160 million pounds of industrial wastes were deposited at the site.

The waste facility is adequately capped, vegetated and well-maintained. A fence and locked gate control access to the site. The site is located in rural Clay County. Several residences are within one-half a mile.

Environmental Problems and Areas of Concern Related to Site:

Groundwater contamination has been investigated and continues to be monitored and evaluated under a hazardous waste management permit issued by the Missouri Department of Natural Resources (the department) on December 19, 2000. Off-site groundwater contamination has been documented.

A ravine, which collects surface runoff and outcrop effluent, intermittently discharges into a stream. The stream flows by a domestic dwelling about 1,000 feet downgradient. Sample results for the past several years indicate detections of contaminants at these surface sampling (S-2, S-7) points. S-2 is also known as outfall 002 of BFI's water permit.

The Kansas City Regional Office issued a Notice of Violation of the Missouri State Operating Permit (MSOP) Number MO0099503 on June 3, 2010, as required by the Missouri Clean Water Law for not responding to outfall exceedances of tetrachloroethylene in December 2009 and March 2010. On September 1, 2010, another Notice of Violation was also issued. BFI is actively investigating and responding to these notices.

The Hazardous Waste Program (HWP) issued a Comprehensive Monitoring Evaluation (CME) to BFI in February of 2010. This report concluded that the extent of contamination was no longer clearly defined and that further site characterization is necessary. BFI submitted responses and proposals for additional monitoring wells on May 27, 2010.

On July 1, 2010, we received a letter on BFI's behalf providing formal notification, in accordance with their MHWMF Part I Permit, of a release discovered in the creek on the permitted property. The release was described as "a limited number of small conglomerations of a dense, heavier-thanwater substance." A sample was taken and analyses reportedly indicate that the release contains "some volatile organic solvents and hydrocarbons." The letter also indicated that the "permittee is conducting an investigation

regarding the composition and source of the substance to assess whether any response actions are necessary or appropriate."

BFI Waste Systems of North America LLC has hired a response contractor, Environmental Specialists, Inc. (ESI), to continue emergency response actions in the creek. Those emergency response actions are continuing and consist of installation of four double-boom checks and placement of sorbent pads in the creek to reduce or eliminate any further impacts to surface water. ESI is continuing the daily inspections and replacement of the booms and sorbent pads as necessary.

Geosyntec Consultants are investigating the surface water releases on behalf of Republic Services, Inc. The Department received the Surface Water Impact Investigation Work Plan on July 27, 2010. Subsequently, the Newly Identified Release Report of Surface Water Impact was submitted on July 14, 2011. The report requests to add additional wells to further delineate the waste source location. Potential technologies identified in conclusion of the report are in-situ treatment, hydraulic barrier in the form of grout curtain, hydraulic containment by groundwater extraction either vertically or horizontally, and a combination of the above technologies.

Remedial Actions at Site:

In September 1983, BFI Missouri City discontinued operations. BFI developed a closure plan that was approved by the EPA and the department in December 1984. In the spring of 1985, BFI began implementing the closure plan. Closure certification was provided on November 27, 1987. During the closure process, a contaminated roadway and ravine were identified and characterized by BFI. BFI capped these areas in 1989.

BFI installed gas monitoring wells along the west and south perimeter of the facility. Prior to this installation, BFI analyzed the airspace of groundwater monitoring wells for combustible gas content. One groundwater monitoring well, located within 90 feet of a residence, contained significant amounts of combustible gas, primarily methane. Subsequently, BFI installed and is operating a

gas recovery system around the west and south boundaries of the site. As a result, the level of combustible gas has fallen below detection levels in the well near this residence. The suspected source of methane is the sanitary landfill. The dense cap covering the landfill apparently prevented the gas from escaping. The success of BFI's methane gas collection and treatment system significantly reduced the threat of methane gas to human health and the environment.

A small surface stream, flowing east northeast from the drainage trench, past the chemical landfill, was sampled for sediment contamination in August 1986. The EPA evaluated results of this soil sampling, the quarterly water sampling of on-site and off-site monitoring wells, and surface streams. A leachate collection system and french drain are being used on site to prevent off-site runoff and migration. Leachate is collected weekly and transported off site for treatment.

Quarterly groundwater and surface water sampling in 1994 and 1995 indicated groundwater contamination was surfacing at outcrops along a ravine southeast of the fill areas and downgradient of the groundwater interceptor trench. In 1996, BFI added an interceptor trench and collection sump to collect leachate at the outcrop areas. They also installed an additional monitoring well to better determine the extent of contamination. In 1997, BFI addressed cap maintenance on the New Gelatin Basin and reshaped erosion letdown areas on the east side of the landfill.

BFI investigated releases to groundwater under an EPA Corrective Action Order. BFI conducted the RCRA Facility Investigation, the first phase of corrective action, and implemented Corrective Measures. A permit issued December 19, 2000, includes provisions for long-term monitoring and maintenance of the site. Due to the detection of contaminants at surface water sample locations S-2 and S-7 and the similarity of those organic detections in Sump 4, BFI submitted an interim stabilization measures (ISM) to upgrade and reinstall Sump 4. Initial investigations showed the sump did not have a competent bottom. The department approved the ISM in August 2003, and the sump was excavated and reinstalled properly in October 2003.

BFI installed another upgrade to Sump 4 during September and October of 2007. The major components consisted of a submersible pump inside the existing Sump 4 structure, a dual-contained above ground storage tank located about 300 yards up hill from Sump 4 and a dual-contained fluid conveyance pipe leading from the existing Sump 4 to the above ground storage tank. This will allow for easier access to remove the fluid collected by Sump 4 and is inspected on a regular basis and has a telemetric monitoring system to alert the operators when a breach of the primary containment tank has occurred or if the fluid in the tank nears the tank capacity.

Additional upgrades to Sump 3, Sump 4, and Trench D were installed in July of 2010. These upgrades included the addition of two 30,000 gallons tanks to hold an increased the on-demand liquid evacuation from Sump 3, Sump 4, and Trench D. The increased liquid removal from the landfill should reduce off-site surface seepage showing up at S-2 and S-7.

BFI submitted a modification to the October 2010 Interim Stabilization Measure Work Plan on June 26, 2013. The modified work plan was for the addition of a third 30,000 gallon above storage tank due to higher liquid collection volumes with the installation of the Stream Bank Interceptor Trench. The Department approved the work plan on September 4, 2013. Sump 4 has been removed as part of the construction of the Stream Bank Interceptor Trench, and the impacted groundwater that it collected has been routed into the Stream Bank Interceptor Trench which discharges to Sump 5.

BFI submitted an Interim/Stabilization Measures Work Plan (IMWP) on August 20, 2012, and a revised Work Plan on October 15, 2012, which was approved by the department on October 17, 2012. The IMWP included the removal of impacted material from the stream bed, but during excavation the impacted material extended to approximately two feet below the base of the stream bed.

BFINA submitted an Interim Measures Work Plan Addendum #5: Stream Bank Interceptor Trench on July 23, 2014. The Work Plan was for the construction of a concrete curb along the edge of the access road, to prevent rainfall from getting underneath the concrete access road. The Work Plan was also for an application of concrete to the lower slope between the concrete access road and the stream bank interceptor trench, to prevent rainwater from infiltrating behind the concrete plug on top of the stream bank interceptor trench. The Work Plan was approved on August 5, 2014.

BFINA submitted a Remedial Action Plan (RAP) Permit Application, dated July 24, 2013. The RAP was prepared to obtain a permit to treat hazardous remediation waste at the facility using an on-site water treatment unit. The hazardous remediation waste collected from the stream bank interceptor trench will be treated by an on-site treatment unit. For the time being, the waste is pumped to the existing on-site storage tanks and disposed of off-site.

General Geologic and Hydrologic Setting:

The soil, which averages 15 to 20 feet in thickness, is composed of moderately- to highly-permeable loess. Contaminants that leak into the permeable soil may eventually resurface downslope. Surface water flow in tributaries may subsequently transport the contaminants onto the Missouri River alluvium, recharging that important aquifer. In fact, leakage has already affected shallow groundwater in the site's immediate vicinity.

The underlying bedrock consists of the Winterset Limestone and the Bethany Falls Limestone. A 5 to 7 foot sequence of shale is present between the limestone units. Several thin shale and limestone units are present beneath the Bethany Falls Limestone. Sandstone of the Pleasanton Group underlies these shales and limestones. All of the bedrock units, particularly the limestones, exhibit fracture permeability.

Public Drinking Water Advisory:

Missouri City purchases drinking water from surrounding water systems. Excelsior Springs has four active and one proposed well 3.8 miles east of the site. Tri-County Water Authority operates three wells 3.5 miles southeast of the site. Kansas City Water Services operates two wells at Atherton 3.5 miles southwest of the site. Liberty operates ten wells 6 miles southwest of the site. All of these wells are constructed in the shallow alluvial aquifer. None have been impacted by the site, but they demonstrate that the local groundwater is highly used as a source of public drinking water.

The predominant use of groundwater and surface water adjacent to the facility is for agriculture and livestock watering. Two shallow, hand-dug wells and a spring (Kinkade) have been identified in the immediate vicinity of the landfill. The hand-dug wells range in depth from about eight to ten feet and yield relatively small quantities of water (less than two to three gallons per minute). The Kinkade Spring is still used by at least one person.

Health Assessment:

Wastes included phenoxyacetic herbicide wastes, organophosphates, phenols, paint strippers, chrome sludge, waste acids, and other hazardous materials. Approximately 160 million pounds of hazardous wastes were deposited at the site during its operation. Many of these wastes have the potential to attack the central nervous system, kidneys, lungs, gingival tissue and skin. Some are known human and animal carcinogens and can cause teratogenic effects. A spring that is used as a drinking water source was contaminated. Sampling conducted in April1999, showed trichloroethylene (TCE) below the Environmental Protection Agency's public drinking water standard, the Maximum Contaminant Level (MCL). TCE is a proven animal carcinogen and a central nervous system depressant.

The Missouri Department of Health and Senior Services (DHSS) has sampled the well identified in the 2004 health assessment by BFINA as WKIN for the past ten years utilizing three different labs. Detections of organic contamination by trichloroethene (TCE) and tetrachloroethene (PERC) have been found in this well at levels well below the action level in the past. Although BFINA (Herst) has never found organic contamination in this well, including the latest data in 2004, DHSS' results for 2004 once again found

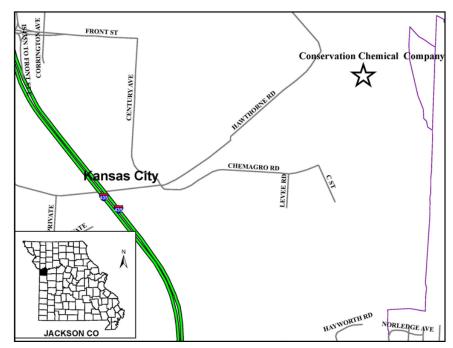
trichloroethene well below the action level.

The landfill has been formally closed and a and a compacted soil cover applied. The cover is designed to prevent surface water from coming into contact with the wastes. This corrective action has helped to reduce exposure resulting from direct contact with contaminated soil and fill material, runoff as surface water and sediment, and infiltration of contamination to potable groundwater.

Based on available information, a potential health threat from exposure to groundwater from this site exists.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Conservation Chemical Company



<u>Site Name</u>: Conservation Chemical

Company

Classification: Class 2

<u>Date of Registry Placement</u>: January 9, 1984

<u>Site Address</u>: 8900 Front Street, Kansas City, Missouri, NW 1/4, Sec. 29, T. 50N, R. 32W, Jackson County, Liberty Quadrangle

Present Property Owner: Conservation

Chemical Company

Lead Agency: EPA

Waste Type: Organic compounds, solvents, acids, caustics, metal hydroxides, cyanide compounds, pesticides, herbicides, waste oils, arsenic, and elemental phosphorus

Quantity: Estimated 93,000 cubic yards of material buried on-site.

Site Description:

The Conservation Chemical Company (CCC) Site covers about 6 acres and is situated on the flood plain of the Missouri River near the confluence of the Missouri and Blue Rivers on

the river side of the levee. It is located in an industrial area, about 1.75 miles east of Interstate 435 along Levee Road in Kansas City, Missouri.

The Conservation Chemical Company began operating at the site in 1960. Industrial wastes were disposed at the site from 1962 to 1980. In 1975, the Missouri Department of Natural Resources (the department) investigated the operation and ordered it closed and cleaned up. The CCC site was closed in 1979. Post-closure activities that, concluded in 1980, included capping the six lagoons and grading and vegetating the remaining portion of the site. The entire property was fenced to restrict access.

Environmental Problems and Areas of Concern Related to Site:

Site investigations conducted from 1979 through 1984, by the U.S. Environmental Protection Agency (EPA), and a Remedial Investigation conducted by the Defendants in 1984, indicated that contaminants were entering the groundwater and migrating offsite. Phenols, heavy metals, and organic compounds were the major contaminants detected in the groundwater.

The CCC site is located in the flood plain at the confluence of the Missouri and Blue Rivers on the river side of the levee. The wastes at the CCC site were stored in six unlined pits and buried at least eight feet deep.

Groundwater depth varies from about five to thirteen feet. During the wetter parts of the year, groundwater comes into direct contact with the wastes. Since some of the wastes were hazardous and explosive in nature, the lagoons were solidified with fly ash rather than dewatered and excavated during post-closure activities.

Remedial Actions at Site:

The Focused Feasibility Study, completed in May 1985, evaluated remedial alternatives for the CCC site. The EPA selected a Remedial Action (RA) that consisted of building a concrete wall around the CCC site with interior pumping and treating of the groundwater.

In 1986, additional investigations revealed that the depth to bedrock was about 160 feet, making the construction of the concrete wall more difficult. Also, in 1986, Superfund was amended and regulatory requirements changed. In light of these changes, the EPA reassessed potential remedies.

A ROD was signed in September 1987. The selected remedy consisted of: (1) surface cleanup, including demolition and disposal of existing buildings, tanks and debris; (2) installation of a two-layer protective surface cap over the existing fill, consisting of stable loess and topsoil; (3) installation of an extraction well system to achieve an inward groundwater gradient, to be measured by piezometer pairs along the perimeter of the site; (4) installation of a groundwater treatment system; and (5) off-site groundwater quality and water level monitoring to assess changes in the groundwater quality around the CCC site.

The Consent Decree was signed in April 1988. RA construction was performed in three phases. Phase I (completed August 1989) included: (1) surface cleanup and regrading the site's surface; (2) placement of a two-layer protective surface cap; and (3)

placement of rip-rap and installation of a 6-foot high metal perimeter fence. Phase II (completed April 1990) included installation of the following wells: (1) four pairs and redevelopment of two pairs of monitoring wells; (2) four pairs of piezometers; and (3) two on-site extraction wells. Phase III (also completed April 1990) was the construction of the on-site groundwater treatment plant.

The Consent Decree requires annual meetings between the EPA, the department and the Defendants to review the status of remedial activities. In addition, the Consent Decree specifies that RPs shall submit the following reports: (1) State Operating Permit Reports; (2) Off-site Groundwater Monitoring Reports; (3) Metals Removal Reports; and (4) Groundwater Level Monitoring Reports.

The startup of the groundwater extraction well system, monitoring well network, and groundwater treatment plant began in April 1990. The Defendants are required to operate the extraction system and groundwater treatment plant for at least 30 years.

Sampling and monitoring of the extraction and monitoring wells and piezometers must be done regularly. The groundwater extraction well system achieved the inward gradient requirements until August 2000. Multiple conditions including the Missouri River's low water flow led to problems maintaining the inward gradient. The EPA requested the RPs conduct a study of the groundwater plume. The study was completed in October 2004, and it documented that the system had maintained hydraulic control even with the failure of an inward gradient.

Originally, the treatment process involved two metal precipitation systems: lime and sulfide. In March 1999, the sulfide system was taken offline due to problems. The modified treatment system continued to remediate the plant's effluent to meet state operating permit (MSOP) criteria. The EPA with the department assistance drafted an Explanation of Significant Differences (ESD). In January 2003, the EPA signed the ESD for the permanent removal of the sulfide system, thus creating a modified treatment system, with the departmental concurrence.

The surface cap must be inspected at regular intervals. Any erosion must be repaired immediately and vegetative cover added if needed. The grass must be mowed during the growing season. No excavation into the surface cap will be allowed without prior written approval. Wastes generated by the treatment plant must be disposed properly. An annual operating summary must be prepared at the end of each calendar year.

In June 1996, the RPs presented a proposal to the EPA and the department to allow them to explore alternative approaches to remediate the site. Approval was given to explore alternative approaches while maintaining the current remedy. Based on the project's conclusions, an alternative remedial approach to the site's remedy was not proposed.

Five year reviews ensure that the chosen remedy functions as designed. The first Five-Year Review was completed by the EPA in February 2000. EPA completed the second Five-Year Review in September 2007. Both reviews determined that all response actions complied with the requirements of the ROD and Consent Decree. The reviews also determined that risks associated with direct contact to the on-site wastes were eliminated.

The second review determined the remedy is functioning as intended and is meeting the performance criteria of the Consent Decree; however, four issues were identified that will need further assessment/investigation and evaluation before the next five-year review. It identified the potential for migration of contaminants into the Missouri River affecting the river's ecosystem. Work continues by the Agencies and the Defendants separately, in reassessing and re-defining the hydraulic control of the contaminant plume and its potential health risks.

Due to deteriorating conditions in the South (extraction) well, the Defendants recommended replacing the well in October 2007. The Agencies granted approval of the South Well in May 2008, and the well will be replaced in late-2008.

Over a number of years there has been a decrease in the metals concentrations within the influent stream. In 2009, the EPA and the department approved a work plan to allow the Defendants to investigate, as an Optimization Test, operating the groundwater treatment system without the metals precipitation system. The Optimization Test began in June 2010. The system performed as expected with no surprises encountered. On October 25, 2010, the Agencies received a "Proposal for Ongoing Pilot Operations -FSRAC Groundwater Treatment Plant." The issue was discussed and withdrawn by the Defendants during the Fall Annual meeting. The treatment systems continue to function as designed.

General Geologic and Hydrologic Setting:

On-site soil is greater than 100 feet thick and is composed of alluvial sand, silt and clay. Typically, the grain size of these materials increases with depth. Bedrock is principally composed of interbedded shale and limestone, but is relatively unimportant in considering groundwater contamination potential because of its low permeability and great depth.

The alluvial aquifer is an excellent source of water. The elevation of the water table fluctuates, depending on the water level of the Missouri River. The direction of normal groundwater flow beneath the site is anticipated to be northeast toward the river. During flood stage, however, groundwater is recharged by the river.

The principal concern at this site is the potential for lateral migration of hazardous wastes off-site. Subsurface migration of contaminants through alluvial materials to the Missouri River is occurring.

Public Drinking Water Advisory:

The Independence Well Field is located in the Missouri River alluvium about four miles downstream. The nearest water system with an intake in the Missouri River is Lexington, 36 miles downstream. Any releases from the site would affect the water quality of the Missouri River but would pose little threat to downstream public water systems due to

dilution and natural purification.

Health Assessment:

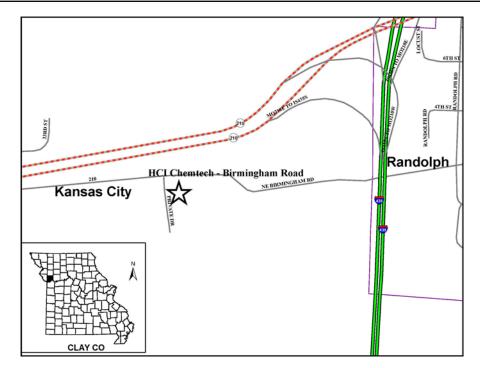
The following are the major contaminants of concern: benzene; cyanide; vinyl chloride; methylene chloride; 1,1,1-trichloroethane; trichloroethylene; 1,2-dichloroethane; chloroform; lindane; phenol; mercury; chromium; lead; arsenic; cadmium; and nickel. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

The closest public water supply is four miles downstream. Private drinking water wells are closer; however, they are shallow, alluvial wells located on the other side of the Missouri River. The closest use of groundwater is at Bayer Chemical-Agriculture Division Headquarters that uses water from a well at its facility to dilute wastewater prior to release.

Although no direct evidence of human exposure exists from this site, the possibility exists because of its open and unguarded accessibility via the levee.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

HCI Chemtech - Birmingham Road



Site Name: HCI Chemtech-Birmingham Road

Classification: Class 2

Date of Registry Placement: March 5, 1999

Site Address: 6301 Northeast Birmingham Rd., North Kansas City, Clay County, Missouri, W ½, SE ¼, SW ¼, Sec. 9, T.50N, R.33W, North Kansas City Quadrangle

<u>Present Property Owner</u>: Brenntag, Inc., (Portion on Cerner Corporation)

Lead Agency: MDNR

<u>Waste Type</u>: Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), herbicides

Quantity: Not determined

Site Description:

The HCI Chemtech - Birmingham Road Site is a bulk chemical storage and distribution facility that has been in operation since 1968. The facility encompasses 11 acres situated along the northern bank of the Missouri River. Residences are located about 1,000 feet north

of the site. The site is fenced with a security restrictive gate. On-site structures include an office, warehouse, maintenance buildings, boiler heating facilities, laboratory, and tank farms that contain 22 active aboveground storage tanks (ASTs). Only nine of the ASTs are active. Current storage and handling activities are restricted to caustics, asphalt, and diesel emission fluid (DEF) due to the transfer of some operations to the HCI Chemtech - Stillwell Street facility. A portion of the HCI Chemtech – Birmingham Road site is on property currently owned by the Cerner Corporation.

During previous site operations, as many as 66 ASTs have been used at the site. Until 1995, when the floors were paved with concrete, 46 of those tanks were located in containment areas with earthen floors. The tanks were grouped in eight tank farm areas.

Bulk chemicals were delivered to the facility by trucks, barges and railcar and were stored in ASTs. Chemicals have been mixed or repackaged prior to sale or sold in bulk. The truck fleet distributed the chemicals primarily via tank truck or drums.

Spills are the probable source of on-site

contamination of soils and groundwater with VOCs, SVOCs and herbicides. The HCl Chemtech - Birmingham Road facility has a history of spills and releases of hazardous materials that dates back to the 1970's. The most serious of these releases occurred on September 10, 1995, when at least 13,000 pounds of rayon grade sodium hydroxide was released on site. The company diluted this material with water and released effluent with a pH of 12.8 into the Missouri River.

Environmental Problems and Areas of Concern Related to Site:

VOCs have been detected at concentrations above health-based screening levels in soil and groundwater. The pH of shallow groundwater has been documented at values ranging from 6.85 to 11.9. The site is located in a 20-year flood plain. A significant potential exists for site-related contaminants to be released to the Missouri River during a flood event. Erosion and dissolution of waste during flood conditions could allow for direct transport of contamination or could result in the generation of leachate. Significant releases of contaminants from the facility entered the Missouri River in 1994 and 1995. Groundwater to surface water discharge is also likely. Groundwater generates seepage along the river bluff, and this seepage discharges into the Missouri River.

In 1992, three employees were killed by an explosion at the site. The workers were welding near a tank emitting anhydrous ethanol vapors.

The 2002 annual Registry inspection noted that an area of ground in the southwest corner of the site was slumping off into the drainage area of the Missouri River. The area of slumping was about 15 feet long and receded about 15 feet from the property fence line. The site owner stabilized the area soon after the inspection.

On December 13, 2012, the department's Kansas City Regional Office (KCRO), which reviews the facility's wastewater discharge monitoring reports, issued Brenntag a Letter of Warning (LOW). The LOW cited discharge monitoring reports for February, March, April

and September 2012 in which pH effluent limitations had been exceeded. The facility is in the process of addressing the issue by changing the pumps in the boiler house to eliminate the use of cooling water and active discharge at the outfall in question.

Remedial Actions at Site:

A Notice of Violation was issued to HCI Chemtech after an inspection by the Missouri Department of Natural Resources (the Department) on December 10, 1993. Citations included failure to have secondary containment and maintaining a satellite area of unlabeled drums near the hazardous waste storage tank. A joint hazardous waste and air pollution compliance evaluation was conducted by the Department on August 2, 1995. The company was cited for 17 violations of the Missouri Hazardous Waste Management Law. The violations indicated that the company was not properly handling hazardous waste nor maintaining adequate secondary containment for hazardous materials.

Following a release of sodium hydroxide from the site in September 1995; HCI Chemtech was indicted for criminal violations of the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), and of the Resource Conservation and Recovery Act of 1978. HCI Chemtech pled guilty to one violation of the Clean Water Act and was placed on probation. As a special condition of this probation, HCI Chemtech was required to adopt corporate and compliance monitoring programs for each of its facilities in Missouri. A Compliance Agreement was entered into by HCI Chemtech, the United States Attorney's Office, the U.S. Environmental Protection Agency (EPA), and the Department. It became effective November 7, 1997, and specifies that HCI Chemtech shall investigate and characterize its sites.

The Department completed a CERCLA Preliminary Assessment (PA) in March 1998. HCI Chemtech submitted a Remedial Investigation work plan to the EPA and the Department for the Birmingham Road facility. The work plan outlined additional investigation

as part of the compliance agreement. The investigation was designed to help determine the horizontal and vertical extent of contamination in both the soils and the groundwater at the site. The consultants for HCI Chemtech began work the week of May 8, 2000, and returned the week of June 5, 2000, to conduct additional sampling. HCI Chemtech conducted quarterly groundwater monitoring for two years. In the fall of 2000, Brenntag Inc. purchased HCI Chemtech. The compliance Agreement expired in fall 2000 when the HCI Chemtech's probation ended.

Brenntag submitted a draft work plan to the EPA for additional investigations. Groundwater monitoring was continued. The EPA entered into negotiations on an Administrative Order on Consent (AOC) with Brenntag to ensure continued investigation leading to a site cleanup. In the Fall of 2006, EPA dropped negotiations with Brenntag and turned the site over to the State to negotiate a cleanup. On September 2, 2008, Brenntag, the Missouri Attorney General's Office and the Department entered into an Abatement Order on Consent (Order) for Remedial Investigation/Feasibility Study (RIFS) of the site. The Order requires Brenntag to conduct a RIFS under department supervision. The goals of the RIFS are to determine the nature and extent of contamination on the site, and determine and evaluate alternatives for remedial actions, if any. In May 2009 the department approved Brenntag's RIFS workplan.

The Phase II Remedial Investigation and associated Human Health Risk Assessment (HHRA) and Ecological Risk Assessment (ERA) reports, Revised March 9, 2012 were approved by the department on April 3, 2012. The investigations involved the sampling and analysis of surface and subsurface soil, groundwater, sediment, surface water and seep samples.

The RI confirmed four soil source areas in the central portion of the site: aboveground storage tank area, former chemical storage warehouse, northern truck loading area, and rail loading rack. Groundwater characterization defined the extent of

petroleum and chlorinated VOCs in groundwater to the north, east and west. It is apparent that dissolved phase VOCs at concentrations above screening levels are entering the Missouri River along the southern boundary of the site. Herbicides were not found at concentrations above screening levels. Therefore no additional investigation or remediation is necessary for herbicides at the site.

The HHRA determined that there are no unacceptable risks to any of the current exposure scenarios (i.e., current site worker or current site visitor) or hypothetical future scenarios for visitors or trespassers. However, unacceptable risks were calculated for the hypothetical future site worker, construction worker, and resident scenarios. The results of the ERA indicated that no unacceptable risks to any current exposure scenarios or hypothetical future scenarios exist. However, the ERA assumptions may need to be revisited in the event that the asphalt is removed from the site.

The RI recommended a soil vapor extraction (SVE) pilot test to evaluate the use of SVE for the interim soil remediation of the soil source areas and thus mitigate further leaching to groundwater. The SVE/air sparge pilot test was conducted in May of 2013. The Summary Report was finalized and approved in November 2013. The FS process continues with the preparation of a Memorandum on Remedial Action Objectives.

From June 2000-2009, the groundwater monitoring network consisted of up to eight shallow monitoring wells, which were sampled for VOCs on a quarterly basis. The highest levels of VOCs were in MW-2, MW-3, MW-7 and MW-8 in the central portion of the site. As part of the Phase II RI, in 2009, the monitoring wells were replaced and additional wells installed, bringing the network to a total of fourteen wells, including two well couplets. The expanded monitoring well network better captures the lateral and vertical extents of the contaminant plume at the site. Quarterly monitoring continued until first guarter 2012, after which Brenntag proposed conducting semi-annual monitoring due to the consistency of constituent concentrations in

groundwater. The semi-annual groundwater monitoring program was started in May 2013.

General Geologic and Hydrologic Setting:

The HCI Chemtech-Birmingham Road Site is located within the 20-year flood plain just to the north of the Missouri River. The topography is generally level.

The site is underlain by about 120 feet of moderately- to highly-permeable alluvium, composed of interbedded sand, gravel and clay. The alluvium is, in turn, underlain by the Pennsylvanian-age Kansas City Group, which is made up of interbedded shales and limestones with low to moderate permeability.

The alluvial aquifer is recharged through surface water infiltration, as well as through discharge from surrounding bedrock. In general, the groundwater within the alluvium beneath the site flows toward the Missouri River. Hydraulic gradient and actual groundwater flow direction are dependent upon fluctuating river level. Site-related contaminants could potentially discharge to the Missouri River.

Public Drinking Water Advisory:

The nearest public drinking water wells are 6.8 miles downstream of the Birmingham Road facility in Courtney Bottoms along the Missouri River. The nearest surface water intake downstream of the Birmingham Road facility is over 40 miles away. No drinking water sources are immediately impacted by the site. However, the type and amount of chemicals at the Birmingham Road facility do threaten the potentially usable groundwater.

Health Assessment:

Soil and groundwater are contaminated with the following solvents: tetrachloroethylene, trichloroethylene, 1,2-dichlorobenzene, benzene, toluene, ethyl benzene and xylene.

Benzene, toluene, ethyl benzene and xylene are volatile organic compounds commonly associated with gasoline. The most toxic of the four is benzene. A known human carcinogen, benzene has been shown to

cause leukemia and aplastic anemia in children.

Ethyl benzene can cause kidney and liver damage. All four compounds can cause dermatitis and central nervous system depression that is characterized by dizziness, headache, loss of coordination, and narcosis. Chlorinated solvents such as tetrachloroethylene and trichloroethylene are considered hazardous because they are mutagenic, carcinogenic, and teratogenic.

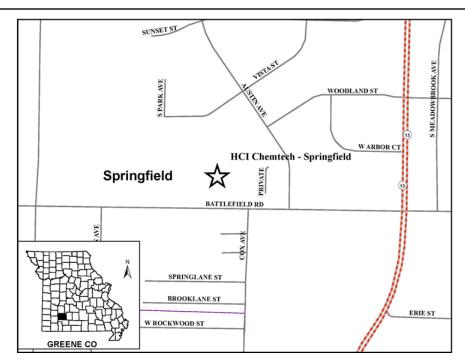
In fall 2009, seven additional monitoring wells were installed in addition to replacement of the existing seven monitoring wells.

Groundwater monitoring continues at the site.

Four private drinking water supply wells were identified within a four-mile radius of this site. However, the Missouri Department of Health and Senior Services has not monitored these private wells because they are too far from the site.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

HCI Chemtech-Springfield



Site Name: HCI Chemtech-Springfield

Classification: Class 2

Date of Registry Placement: March 26, 1999

Site Address: 2235 W. Battlefield Road, Springfield, Greene County, Missouri, SE ¼, NW ¼, Sec. 3, T.28N, R.22W, Springfield Quadrangle

Present Property Owner: Brenntag, Inc.

Lead Agency: DNR

Waste Type: Includes but is not limited to; Volatile and semi-volatile organic compounds including benzene ethylbenzene, toluene, Total xylenes, naphthalene, cis-1,2-dichloroethylene, 1,1-dichloroethane, 1,2-dichloroethane, trichloroethylene, tetrachloroethylene, and vinyl chloride.

Quantity: Not determined

Site Description:

A chemical distribution facility has operated at the site since 1975. The site encompasses 3.75 acres in a commercial and light industrial area. Residences are located about 800 feet from the site. On-site structures include an office, warehouse, bag house (formerly a drum rinsing building), drum storage canopy, and a storage shed. An inactive tank farm that contained a number of aboveground storage tanks (ASTs) within a concrete floored containment area were removed in early 2012.

Spills and drum rinsing are the probable sources of on-site contamination of soils and groundwater. Previous operations at the site included chemical storage, chemical blending, unloading of chemicals from railcars, drum recycling/reconditioning, and paint spraying. Chemicals that were handled and stored at the facility included caustics, aromatic solvents, acids, ketones, alcohols, glycols, petroleum hydrocarbons, and chlorinated solvents. The facility never manufactured chemicals. Currently, the facility only stores and distributes pre-packaged chemicals. Two spills were documented at the site. One spill consisted of chlorinated solvents during the mid-1970s, near the northern property boundary. The other spill occurred in June 1986 and involved approximately 500 gallons of solvent (230 gallons of which was recovered) in the former tank truck loading area.

Environmental Problems and Areas of Concern Related to Site:

VOCs have been detected at concentrations above health-based screening levels in shallow groundwater, soil, soil gas and subslab soil gas beneath the warehouse at the site. Shallow groundwater VOC contamination has migrated off-site onto property to the north and west of the site.

Remedial Actions at Site:

Following a release of sodium hydroxide in September of 1995 at its Birmingham Road facility in Kansas City; the owner of the site, HCI Chemtech, was indicted for criminal violations of the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and the Resource Conservation and Recovery Act of 1978. HCI Chemtech pled guilty to one violation of the Clean Water Act and was placed on probation. As a special condition of this probation, HCI Chemtech was required to adopt corporate and compliance monitoring programs for each of its facilities in Missouri. A Compliance Agreement was entered into by HCI Chemtech, the United States Attorney's Office, the U.S. Environmental Protection Agency (EPA) and the Missouri Department of Natural Resources (the department). It became effective November 7, 1998, and specified that HCI Chemtech investigate and characterize its sites.

During fiscal year 1999, the EPA and the department approved a Remedial Investigation (RI) Work Plan for the site. Subsequently, an RI was conducted. This investigation showed that contaminants in shallow groundwater migrated off site. A high vacuum soil vapor extraction (SVE) system was installed as an interim remedial action to hydraulically contain contaminants on-site and treat contaminants in the source areas.

Brenntag, Inc., purchased HCI Chemtech in the fall of 2000. The Compliance Agreement expired in the fall of 2000, when HCI Chemtech's probation ended. Three monitoring wells were installed into the Springfield Plateau aquifer in July 2000, and later sampled. The results showed

contamination in the Springfield Plateau Aquifer. The department completed an Expanded Site Inspection in March 2001. Brenntag signed an Administrative Order on Consent with the EPA in the fall of 2001 to perform a RI and to continue operating the SVE system as a removal action. The RI began in the summer of 2002.

The high vacuum SVE system continues pumping and treating contaminated groundwater and the associated soil vapors. Treated water is ultimately discharged to the City of Springfield's wastewater treatment system according to a permit. On-going groundwater monitoring results show that the removal action is improving the groundwater quality.

In June 2006, Brenntag Inc. submitted an enhanced reductive dechlorination (ERD) Pilot Test Report. This report demonstrated limited success in using ERD to clean up the soil and groundwater contamination in the northwest area of the site. Based on this initial pilot test and EPA and the Department's concurrence, Brenntag, Inc. implemented an expanded ERD pilot test for the northwest area of the property. The expanded ERD pilot test ran from January 2007 through February 2008, and a report was submitted June 25, 2009.

Since the RI began in 2002, both on and off site fieldwork has been conducted and consisted of additional monitoring well installation and sampling, soil boring advancement and sampling, soil gas sampling around the warehouse and office, and subslab sampling under the warehouse. A Remedial Investigation report (RI), Human Health Risk Assessment (HHRA) and Feasibility Study (FS) were submitted to EPA and the state in 2010. A data gap study was initiated in the spring of 2010, to address deficiencies in the RI. Revised RI, FS and HHRA documents were submitted to EPA and the State in July 2011. These documents were approved in September 2011. The site is expected to transition to the State Cooperative Program to complete the remedial action once a legal agreement between Brenntag and the State of Missouri has been finalized.

A subslab vapor extraction system was installed to remove vapors from beneath the

northern portion of the warehouse building floor. The system was installed in 2009.

General Geologic and Hydrologic Setting:

The HCI Chemtech-Springfield Site is located within the Springfield Plateau portion of the Ozark Plateau physiographic province. It is situated on a highland between South Creek and an unnamed tributary of Wilson Creek.

The site is situated in a karst area. The site is underlain by 0.5 to 2.5 feet of moderately- to highly-permeable fill composed of gravel, sand, silt and clay. The fill is underlain by 15 to 25 feet of tight silty, sandy clay residuum with thin lenses of chert. The residuum is characterized as having low hydraulic conductivity. In turn, the residuum is underlain by Mississippian-age limestone. The highly-weathered limestone is very fractured and permeable in its upper strata. and evidence of karst features abound. Unconsolidated and very fine grain sediment (predominantly clay and silt) have filled the solution voids encountered at the weathered limestone subcrop. Additional karst features in the immediate vicinity include six known sinkholes within one mile of the site as well as known springs and 24 known caves within a four-mile radius.

The Mississippian-age limestones beneath the site compose an unconfined aquifer known as the Springfield Plateau Aquifer. The aquifer is about 300 feet thick in this area. Recharge of the Springfield Plateau Aguifer occurs through infiltration of precipitation. Shallow groundwater within the aquifer moves to the northwest relative to the contaminant source areas. The Northview Formation, which is about 20 feet thick in the vicinity of the site, is present beneath the Springfield Plateau Aguifer. The Northview Formation is considered to be an aquitard, separating the overlying Springfield Plateau Aquifer from the underlying Ozark Aguifer. Typically, the Northview Formation is relatively impermeable; however, locally, the Northview may be breached by faults or boreholes. resulting in some potential for vertical contaminant transport into the deeper Ozark Aguifer. Several on and off-site monitoring wells screened in the Ozark Aquifer indicate that no contamination from the site has

reached the lower aquifer.

Public Drinking Water Advisory:

The nearest public water supply is the U.S. Medical Center, which is served by three wells one-mile north of the HCI Chemtech facility. All public wells in the Springfield area draw water from the deep aquifer. The deep aquifer is isolated naturally from the shallow aquifer by the Northview Formation. It is vital that no open wells occur in the vicinity of the HCI Chemtech facility that would allow contamination to reach the deep aquifer.

Health Assessment:

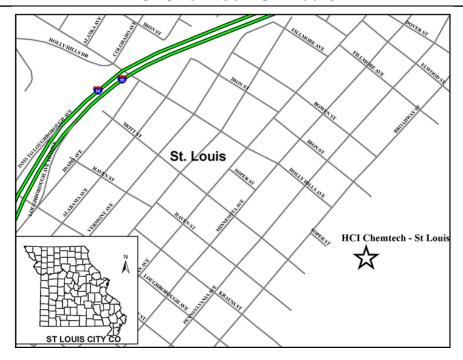
Soil, groundwater, and soil gas are contaminated with various VOCs. In particular, groundwater contaminants found above the public drinking water standards include, but are not limited to: 1,1-dichloroethylene, cis-1,2-dichloroethylene, trichloroethylene, tetrachloroethylene, toluene, benzene, vinyl chloride and xylene. A Human Health Risk Assessment, approved in 2011, documents risk to human health if site contamination is not adequately addressed. Refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Approximately 90 wells have been installed around the site. Pumping and treatment of contaminated groundwater continues.

Treated groundwater is discharged to the city of Springfield POTW under permit. An interim subslab vapor extraction system was installed in the facility warehouse in 2009 to mitigate concerns over the presence of contamination beneath the northern portion of the warehouse building. A site Remedial Investigation with oversight by EPA Region VII and MDNR Superfund Section was completed in September 2011.

A previous investigation by the Missouri Department of Health and Senior Services did not identify any private wells that were in use around the facility. However, due to the magnitude of contaminants detected in the groundwater and the close proximity of homes, a health risk exists at this site.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: HCI Chemtech-St. Louis

Classification: Class 2

Date of Registry Placement: December 28,

1998

Site Address: 139 E. Soper St., St. Louis, Missouri, NW ¼, NW ¼, NW ¼, Sec. 16, T.44N, R.7E, Cahokia III.-Mo.Quadrangle

Present Property Owner: Brenntag, Inc.

Lead Agency: DNR

<u>Waste Type</u>: Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals

Quantity: Not determined

Site Description:

The HCI Chemtech-St. Louis site is an active chemical formulation and distribution facility that has operated at the site since 1967. The site, which is currently owned and operated by Brenntag Mid-South, Inc, encompasses 15 acres in an industrial area. Residences are located about 1,000 feet from the site. On-site structures include an office, a warehouse and tank farms that contain 76 aboveground

storage tanks (ASTs). As many as 92 ASTs have been used during past operations. Those tanks were located in containment areas with earthen floors until 1992 when most of the storage areas were paved with concrete.

Bulk chemicals are delivered to the facility by trucks, barges and railcars, and are stored in ASTs. Chemicals may be mixed, repackaged prior to sale, or sold in bulk. Wastewater generated from drum rinsing is neutralized and discharged to the sewer system under a permit from the local sewer district.

The HCI Chemtech-St. Louis (St. Louis site) site has a history of spills and releases of hazardous materials that dates back to the 1980's. The spills and drum rinsing operation are the probable sources of on-site contamination of soils and groundwater.

Environmental Problems and Areas of Concern Related to Site:

VOCs, SVOCs and arsenic were detected at concentrations above health-based screening levels in groundwater. VOCs and arsenic were detected at concentrations above health-based screening levels in soil. Soil pH values range from 4.5 to 11.2. Hazardous substances from the site could be released to the

Mississippi River during a flood event.

Groundwater quality monitoring was performed on a quarterly basis to evaluate the nature and extent of VOCs in the groundwater until 2004. Monitoring wells 1 and 2 (MW-1 and MW-2) have the highest detected concentrations of total benzene, toluene, ethylene and xzylene (BTEX) and chlorinated VOCs. These wells are located next to and downgradient from the former tank farm where an occurrence of petroleum hydrocarbons was previously documented in shallow soil samples. These constituents are also routinely detected in monitoring wells MW-3, MW-4, MW-5, and MW-8 through MW-13. The BTEX and chlorinated VOCs originating in the central portion of the site have commingled and appear to be migrating toward the Mississippi River and onto property owned by the US Coast Guard (USCG).

In 1991, during a Phase 1 Investigation of the adjacent USCG property, the department observed a black-stained seep on the riverbank that extended across the entire bank. Dark liquid had seeped through small holes in the concrete that stabilizes the bank slope. Just south of the boom dock, dark liquid was seeping from one of the holes and quickly sank into the river water. A sample was collected that had a chlorinated solvent odor and an approximate pH of 11-12.

Monitoring wells were installed during a Phase II Evaluation of the USCG property. BTEX was detected and appeared to be entering the south side of the USCG property from two separate areas of the HCI Chemtech-St. Louis Site. Other compounds including acetone, DCE isomers, TCE, and dichloro-benzene isomers were also detected. Overall, the highest levels of contaminants were detected in two monitoring wells that are located on the south side of the base, next to the HCI Chemtech-St. Louis property.

HCI Chemtech was indicted for criminal violations of the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and the Resource Conservation and Recovery Act of 1978 following a sodium hydroxide release in September 1995, at its

Birmingham Road facility in Kansas City. HCI Chemtech pled guilty to one violation of the Clean Water Act and was placed on probation. As a special condition of the probation, HCI Chemtech was required to adopt corporate and compliance monitoring programs for each of its facilities in Missouri. A Compliance Agreement was entered into by HCI Chemtech, the United States Attorney's Office, the U.S. Environmental Protection Agency (EPA), and the department. It became effective November 7, 1998, and specifies that HCI Chemtech shall investigate and characterize its Missouri sites.

Remedial Actions at Site:

The HCI Chemtech-St. Louis site is not currently on the National Priorities List and has not been proposed for listing. The HCI Chemtech-St. Louis site was placed on the Registry on December 28, 1998.

During fiscal year 1999, the EPA and the MDNR reviewed and commented on plans and reports submitted by HCI Chemtech pursuant to the Compliance Agreement. During fiscal 2000, the EPA and the MDNR approved the Remedial Investigation work plan. Additional monitoring wells were installed. Several rounds of groundwater sampling and hydrogeologic investigations were conducted.

In the fall of 2000 Brenntag Inc. purchased HCI Chemtech. The Compliance Agreement expired in fall 2000 when HCI Chemtech's probation for criminal violations at its Birmingham Road facility ended. No additional characterization or remedial action occurred in fiscal 2002. Quarterly monitoring of groundwater was conducted until 2004.

In 2003, EPA began negotiating Orders for all of the Chemtech sites. Since contamination is migrating off the HCI Chemtech-St. Louis site onto the USCG property, the EPA made it a priority for Brenntag to address the off-site migration problem.

Brenntag conducted quarterly groundwater monitoring in July 2003, December 2003, and

February 2004. Due to the groundwater seep with elevated pH identified along the river bank of the adjacent USCG property, additional site characterization activities were conducted. A recovery well and three observation wells, installed near the eastern property boundary of the USCG Base in July 2003, were used to conduct a short-term pump test. Slug tests were conducted at selected monitoring wells in August 2003. Chemicals of concern (COC) from historical releases present in the subsurface beneath the Brenntag facility were detected in samples collected from the seep.

The EPA finalized an Administrative Order on Consent (AOC) on March 15, 2004, to complete an Engineering Evaluation/Cost Analysis (EE/CA) for the site. The main objective of the EE/CA was to find a removal alternative to intercept the migrating impacted groundwater at the seep to the river and to reduce the pH levels and COC concentrations in the groundwater to acceptable levels. The draft EE/CA Work Plan was submitted in May 2004.

A revised Draft EE/CA Report was submitted in February 2005. The EE/CA recommended Soil Vapor Extraction (SVE) for the on-site contaminated soils and pump and treat of the groundwater with Enhanced Reductive Dechlorination (ERD). In February 2006, the EPA and DNR disapproved the Draft EE/CA. The Agencies met with the environmental consultants working for Brenntag in April 2006, to discuss issues related to the EE/CA."

In 2007, the EPA requested the state of Missouri to assume the leadership of all four HCI Chemtech sites. Negotiations between the State and Brenntag began in late 2009. Negotiations were completed for the St. Louis site on March 15, 2011, with the signing of an Abatement Order on Consent (AOC). A Work Plan for the Phase 1 Remedial Investigation/ Feasibility Study (RI/FS) was completed on July 16, 2012. Brenntag, as the responsible party, is conducting the RI/FS for the Saint Louis site.

General Geologic and Hydrologic Setting:

The HCI Chemtech-St. Louis site is underlain

by 18 to 35 feet of moderately- to highly-permeable fill material composed of sand, silt, slag and rubble. The fill is underlain by 5 to 20 feet of moderately- to highly-permeable alluvial sediments composed of clayey silts and sands. The alluvial sediments, in turn, are underlain by the moderately-permeable, Mississippian-age St. Louis Limestone. The depth to bedrock beneath the site is about 40 feet, with depth increasing toward the Mississippi River.

Shallow groundwater beneath the site is recharged through infiltration of precipitation and through discharge from surrounding bedrock. The direction of groundwater flow is generally to the east toward the Mississippi River, with hydraulic gradient and actual groundwater flow direction dependent upon fluctuating river levels.

Since the site is located in a groundwater discharge setting, contaminants from the site may not impact the underlying bedrock. However, significant potential exists for site contaminants to discharge to the Mississippi River.

Public Drinking Water Advisory:

No public drinking water wells are affected by this facility. The nearest surface water intake is over 30 miles downstream and could only be affected by a very large release.

Health Assessment:

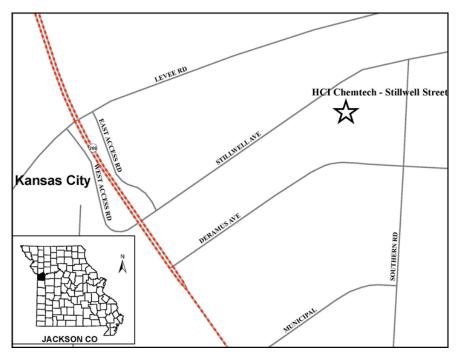
Toluene, arsenic, and several other polycyclic aromatic hydrocarbons (PAHs) [benzo(a) anthracene, benzo(k)fluoranthene, benzo(a) pyrene and indeno(1,2,3-cd)pyrene] have been detected in the soil at concentrations exceeding health-based screening levels. These chemicals and benzene, toluene, xylene, and chlorinated volatile organic compounds have also been detected in the groundwater under the site. PAHs can act as primary irritants to the mucous membranes, causing pulmonary edema, pneumonitis and hemorrhaging in the respiratory system. They may also cause central nervous system depression. Some have been linked to organ damage and cancer. Benzene is a known human and animal carcinogen and a suspected teratogen. Please refer to the

Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Groundwater migration off-site on to the U.S. Coast Guard property may pose a health risk to indoor workers. Risk associated with the groundwater-to-indoor-air pathway may exist. Based on available information, this site poses a potential health threat.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Class 2 Sites 48 HCl Chemtech-St. Louis



Site Name: HCI Chemtech-Stillwell Street

Classification: Class 2

<u>Date of Registry Placement</u>: August 21, 1999

<u>Site Address</u>: 5200 Stillwell Street, Kansas City, Jackson County, Missouri, Sec. 23, T.5N, R.33W, North Kansas City Quadrangle

<u>Present Property Owner</u>: Brenntag Mid South, Inc.

Lead Agency: DNR

<u>Waste Type</u>: Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs)

Quantity: Not determined

Site Description:

A bulk chemical storage and distribution facility has operated at the site since 1981. The site occupies 6.5 acres along the southern bank of the Missouri River levee in a mixed commercial and industrial area. Residences are located approximately one-half mile from the site.

On-site structures include an office, warehouse and tank farms that contain about 50 aboveground storage tanks (ASTs).

Bulk chemicals are delivered to the facility by trucks and railcars and are stored in ASTs. Chemicals may be mixed, repackaged prior to sale, or sold in bulk. Releases and spills are the probable source of contamination of soils and groundwater.

Environmental Problems and Areas of Concern Related to Site:

The site is in the Missouri River flood plain. VOCs and SVOCs were detected in groundwater at concentrations above health-based screening levels. Groundwater contaminants originating on the HCI Chemtech-Stillwell Street property are migrating off site to the north. Site contaminants potentially could discharge to the Missouri River.

Remedial Actions at Site:

In July 1997, a former owner and operator of the site, Unocal Corporation, enrolled the Stillwell Street facility in the Missouri Department of Natural Resources' (the department) Brownfields Voluntary Cleanup Program (BVCP) to investigate and remediate on-site contamination that occurred during its occupancy.

Following a release of sodium hydroxide in September 1995, at the Birmingham Road facility; HCI Chemtech, the site owner, was indicted for criminal violations of the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), and of the Resource Conservation and Recovery Act of 1978. HCI Chemtech pled guilty to one violation of the Clean Water Act and was placed on probation. As a special condition of probation. HCI Chemtech was required to adopt corporate and compliance monitoring programs for each of its facilities in Missouri. A Compliance Agreement was entered into by HCI Chemtech, the U.S. Attorney's Office, the U.S. Environmental Protection Agency (EPA). and the department. It became effective November 7, 1998, and specifies that HCI Chemtech shall investigate and characterize its sites. Because such investigations are required of HCI Chemtech under an enforcement action, in accordance with Sections 260,565 through 260,575 RSMo, the site was no longer eligible for participation in the BVCP. On February 18, 1999, Unocal's participation in the BVCP was terminated.

In June 2000, a Remedial Investigation Work Plan was submitted. In the fall of 2000, Brenntag, Inc., purchased HCI Chemtech. The Compliance Agreement expired in fall 2000 when HCI Chemtech's probation for criminal violation at its Birmingham Road facility ended. Additional monitoring wells were installed in fiscal year 2001, to better define contamination and to determine the effects of variation in groundwater elevation due to fluctuation of the Missouri River level. Quarterly monitoring of groundwater is being conducted.

On May 16, 2007 EPA approved the Soil Vapor Extraction (SVE) Pilot Test and SVE Design Report. The pilot test indicated that source area (soils) contaminated with VOCs can be addressed immediately and additional actions can be implemented if needed.

On June 18, 2007, EPA received the PRP's response to comments on the RI report submitted in January 2007. The FS will follow

the approval of the RI within 45 days. In January 2007, the Remedial Investigation (RI) Report and Human Health Risk Assessment (HHRA) were submitted by ARCADIS for agency review. Based on comments from EPA it was recommended that a work plan be included as an addendum to the RI for conducting site-specific soil vapor sampling. On February 15, 2008, ARCADIS submitted Addendum No. 1. Remedial Investigation Work Plan, Soil Vapor Sampling Program. On February 25, 2008, EPA approved the addendum work plan and soil vapor sampling was completed on March 24-25, 2008. Eight soil samples and one duplicate were collected for analysis of selected volatile organic compounds. The soil vapor results were used in completing the revised HHRA. In August 2008 the Remedial Investigation Report and the Human Health Risk Assessment were approved by EPA.

In September 2008, ARCADIS submitted "Objectives and Requirements of Remediation" which was subsequently approved by EPA in March 2009.

Following he successful completion of the SVE pilot test, the design, and cost estimate, for the SVE system was approved in January 2008. By May of 2008, the SVE wells, underground piping and buildings were installed. The SVE system is expected to be fully operational in the 3rd quarter of 2008.

In January 2009 ARCADIS submitted the "Quarterly Progress Report for October through December 2008" for the subject site. The report indicated that the SVE system has been effective in meeting design criteria regarding vapor extraction rates and radius of influence. The mass removal rates indicate that the system is successfully addressing unsaturated VOC impacted soils. Operation and monitoring data will continue to be collected to provide confirmation of the system effectiveness and will guide changes to system operation to optimize the system performance.

On August 5, 2009, the Memorandum on Development and Preliminary Screening of Alternatives at the Brenntag Stillwell Road site received acceptance approval from EPA. In September of 2009, ARCADIS submitted the Memorandum on Detailed Evaluation of Remedial Action Alternatives for the site, which was approved by EPA in September of 2009, with comments.

In April 2010, ARCADIS submitted the "Quarterly Progress Report for January through March 2010" for the subject site. The report indicated that the SVE system has been effective in meeting design criteria regarding vapor extraction rates and radius of influence. The mass removal rates indicate that the system is successfully addressing unsaturated VOC impacted soils. Operation and monitoring data will continue to be collected to provide confirmation of the system effectiveness and will guide changes to system operation to optimize the system performance.

In June of 2010, ARCADIS submitted the Feasibility Study (FS). EPA approved the FS on January 21, 2011. As a result, EPA has determined that all work in accordance with the Administrative Order on Consent (AOC) to address contamination identified at the facility. Pursuant to the completion of the AOC, EPA issued the Notice of Completion of the AOC on March 16, 2011. On September 21, 2011, EPA transferred future management of the site to the Department. The Department will administer the record of decision process under Missouri's CERCLA authorities. Quarterly progress reports have been submitted through June 2014. The site is expected to transition to the State Cooperative Program to complete remedial action once a legal agreement between Brenntag and the State of Missouri has been finalized.

General Geologic and Hydrologic Setting:

The HCI Chemtech-Stillwell Street Site is located within the 20-year flood plain along the south side of the Missouri River. The topography is generally level.

The site is underlain by about 120 feet of moderately- to highly-permeable alluvium composed of interbedded sand, gravel and clay. The alluvium is underlain by the Pennsylvanian-age Kansas City Group, which is composed of interbedded limestones and shales with low to moderate permeability. The alluvial aquifer receives recharge through

surface water infiltration, as well as through discharge from the surrounding Pennsylvanian-age bedrock. In general, groundwater within the alluvium flows toward the Missouri River with hydraulic gradient and actual groundwater flow direction dependent upon fluctuating river levels. Site contaminants could potentially discharge to the Missouri River.

Public Drinking Water Advisory:

The nearest public drinking water wells are 7 miles downstream of the Stillwell Street facility in Courtney Bottoms along the Missouri River. The nearest surface water intake downstream of the Stillwell Street facility is over 40 miles away. No drinking water sources are immediately impacted by the site. However, the site is impacting potentially usable groundwater.

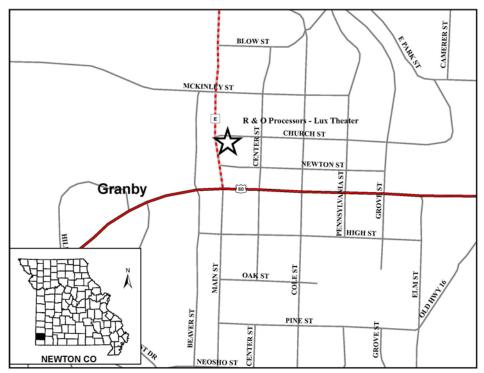
Health Assessment:

Concentrations of benzene, toluene, ethylbenzene and xylene in groundwater exceeded the EPA's drinking water standards, the Maximum Contaminant Level. Other substances found include dichloromethane, vinyl chloride, 1,1-dichloromethane and acetone. Although groundwater is contaminated, no private wells exist in the area.

Benzene is a known human carcinogen. Many of the substances at this site are volatile organic compounds that cause central nervous system depression. Dichloromethane causes eye irritation and digestive system effects when ingested. Vinyl chloride is known to cause liver cancer in humans.

Based on available information, the site represents a human health threat, with on-site workers being at greatest risk.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: R&O Processors/Lux Theater

Classification: Class 2

Date of Registry Placement: October 9, 1996

<u>Site Address</u>: Church and Main, Granby, Newton County, Missouri, SE 1/4, NE 1/4, NW 1/4, Sec. 6, T.25N, R. 30W, Granby Quadrangle

<u>Present Property Owner</u>: Granby Economic Property Development Corporation

Lead Agency: DNR

<u>Waste Type</u>: Metal plating wastes (lead, cadmium, zinc, chromium, cyanide, nickel and copper)

Quantity: Not determined

Site Description:

The R&O/Lux Theater Site is an abandoned electroplating facility located in Granby's downtown area. From 1973 to 1981, R&O Processors operated a metal-finishing plant at the site of the former Lux Theatre. Plating operations included zinc, chromium, nickel,

black oxide, cadmium and anodizing aluminum plating. R&O allegedly disposed of sanitary and metal-finishing rinse water down a 40-foot deep shaft. In 1985, part of the building collapsed, which necessitated demolition of the entire building. Subsequently, several drums containing hazardous waste were found in the building rubble. Soil sampling revealed elevated levels of cadmium, chromium, copper, cyanide, lead, nickel and zinc.

The foundation of the former building that housed R&O Processors was encased in clean concrete but remains visible. A gun repair shop occupied the building next to the property on the south. An alleyway separates the foundation from a residence to the east. Main Street is the western border and Church Street is the northern border of the site.

Environmental Problems and Areas of Concern Related to Site:

While R&O Processors operated the site, an estimated 6,000,000 gallons of metal-plating rinse water were dumped down a 40-foot deep mining shaft on site. This number was obtained by calculating that 15,000 gallons of rinse water per week were disposed of on site over an eight-year period. Robert Moffet,

former operator of the site, acknowledged that rinse waters contained cyanide and metals. This is documented in a complaint by the U.S. Environmental Protection Agency (EPA) in a suit filed against Moffet.

In 1993, the EPA hired Jacobs Engineering Group to evaluate the site according to Site Inspection Prioritization guidelines. The study concluded that cadmium, lead and zinc are present in the soils at concentrations that exceed health-based screening levels. Groundwater has not been thoroughly evaluated.

The site is unsecured. Due to the site's location in downtown Granby, it is readily accessible to the public.

Remedial Actions at Site:

In Spring 2001, the property was donated to the Granby Economic Property Development Corporation. In May 2001, the Department of Natural Resources approved the redevelopment plan to encapsulate contaminated concrete and soil with a concrete foundation for two new buildings that will house a mining museum and visitor center. In July 2001, the new site owner conducted the first phase of work. One upright foundation was pushed over and left in place as fill. The old building's other upright foundation walls were encapsulated in clean concrete. Gravel was placed over the majority of the empty lot next to the old building. Future plans include pouring a new basement floor in the old building; pouring a concrete foundation in the empty lot next to the old foundation; and adding several inches of clean soil to the strip of grass between the old building and the street.

General Geologic and Hydrologic Setting:

In general, the topography is characterized by uplands gently sloping to stream valleys. The site is located in an urbanized area where the topography has been altered by cut and fill excavation to provide a level surface for building construction. Natural surface soil is composed of cherty, red clay residuum which ranges from 10 to 40 feet in thickness. The soil is derived from weathering of the underlying bedrock. Generally, the fill is

similar to natural soil, and both exhibit moderate to high permeability.

The upper aquifer is composed of Mississippian-age strata which are primarily limestone units with a total thickness of 250 to 300 feet. The lower aquifer, encountered about 800 feet below grade, is composed of sandstone and dolomite units of Ordovician age. The upper and lower aquifers are separated by confining beds composed of shale. The limestone and dolomite units are highly permeable due to solution enlargement of bedding planes and joints. The local area is karst, characterized by sinkholes, losing streams, springs and caves.

Most private residences obtain water from low -yield wells that penetrate the upper bedrock aquifer and, in some cases, the overlying residuum. Water supply wells that require high yields, such as municipal wells, penetrate the lower aquifer. Poorly-constructed wells may facilitate migration of contaminants from the ground surface to the deeper, potable aquifers.

Public Drinking Water Advisory:

Three wells serve the city of Granby. The nearest well is 0.25 miles to the southeast at Grove Street and U.S. Highway 60. The other wells are 0.5 miles to the west and 0.9 miles to the southwest. All three wells are cased to a minimum of 337 feet and have not shown any signs of contamination. Precaution should be taken to prevent contamination of the community's source of drinking water.

Health Assessment:

Cadmium, chromium, copper, cyanide, lead, nickel, and zinc were some of the inorganic metals found on this site. Cadmium is a known animal carcinogen and suspected human carcinogen. It attacks the lungs, kidneys, blood, respiratory tract, and prostate and produces teratogenic effects. Chromium attacks the blood, liver, kidneys, eyes, skin, and respiratory system; and some forms of chromium are human carcinogens. Copper is a skin irritant that may also cause gastrointestinal disturbances. Cyanide attacks the liver, kidneys, and central nervous system (CNS) and has been shown to cause

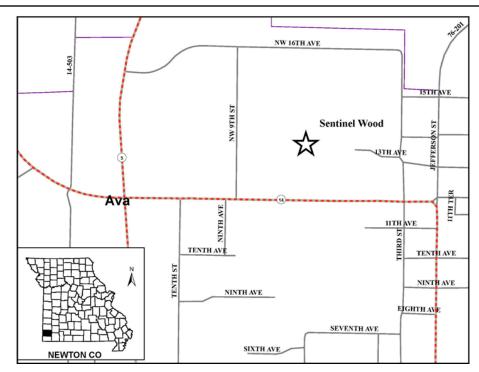
weakness, headaches, confusion, nausea, vomiting, eye and skin irritation, and respiratory effects. Lead attacks the CNS, kidneys, blood, gastrointestinal tract, and gingival tissue. Prolonged exposure can cause irreversible damage to the abovementioned organs or systems. Nickel attacks the respiratory tract and causes skin dermatitis. Some nickel compounds are also known animal and suspected human carcinogens. Forms of some zinc compounds are also known animal and suspected human carcinogens and may affect the peripheral nervous system.

In 2009, a tornado struck the area and power was lost for weeks. None of the private well owners wanted their well tested even after power was restored. No wells were sampled in 2011, because no one still in the area would grant permission, and some of the sampling sites looked to be abandoned. Private wells in the area will continue to be monitored as long as permission is granted. Groundwater apparently flows northward toward a losing stream. The proximity of the site to the municipal well and the karst geology of the area contribute to health concerns. The addition of gravel and concrete to the site by the new owners reduces the potential for exposure through contaminated soil.

Based on available information, wells near the site may be at risk. Additional work is needed to fully assess this risk.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Sentinel Wood Treating



Site Name: Sentinel Wood Treating

Classification: Class 2

Date of Registry Placement: September 11,

1998

Site Address: 412 NW 12th Street, Ava, Douglas County, Missouri, Sec. 11, T. 26N, R.

16W Quadrangle

Present Property Owners: Sentinel

Industries, Inc.

Lead Agency: EPA

Waste Type: Pentachlorophenol, arsenic and

2,3,7,8-TCDD (dioxin) equivalent

Quantity: Not determined

Site Description:

The Sentinel Wood Treating Site is a former wood treating facility that pressure-treated wood with pentachlorophenol (PCP) from 1959 to 1978. Sludge from the pressuretreating process was deposited in three onsite lagoons which were closed when pressure-treating wood on site ceased. The lagoons were backfilled with soil. Scrap

lumber and sawdust from copper chromium arsenate (CCA) lumber were burned in an on site industrial furnace. One surface soil sample, collected in 1997, contained 62 parts per million (ppm) arsenic. Numerous dioxins and dibenzofurans were found on site.

Part of the site is vacant; other portions are active commercial operations including retail stores. The nearest residence is about 200 feet from the facility boundary.

On September 27, 1993, the U.S. Environmental Protection Agency (EPA) conducted a Site Inspection. Subsurface samples collected from the former disposal lagoon area exhibited extremely high concentrations of PCP, up to 11,000 ppm. The Missouri Department of Natural Resources' (the department) Cleanup Levels for Missouri (CALM) Soil Target Concentration Scenario A (residential) for PCP is 6 ppm. Other contaminants commonly found at wood treating sites (phenanthrene, total xylenes and 2-methylnaphalene) were also detected in the lagoon samples. PCP was detected in shallow groundwater near the former lagoon at 180 parts per billion (ppb). The EPA's drinking water standard, the Maximum Contaminant Level, is 1 ppb for PCP.

Environmental Problems and Areas of Concern Related to Site:

Although previous analysis downgradient from the site revealed elevated levels of PCP in the groundwater up to 520 ppb, more recent samples taken since soil removal activities were initiated show the levels of PCP had been reduced significantly.

Remedial Actions at Site:

In August 1997, the EPA conducted a Removal Site Evaluation and documented the presence of several semi-volatile organic compounds (SVOCs). PCP was the only SVOC identified above health-based screening levels in the lagoons, and was also detected at other areas of the property. Dioxin equivalents are present at 23 ppb in the surface behind a retail store, and 10.3 ppb at the 4 to 6 feet interval in the lagoons.

The site was accepted into the department's Brownfields Voluntary Cleanup Program (BVCP) in October 1998. Further sampling and characterization of the portion of the property that does not include the lagoons, was conducted in 1999. A May 1999, report by Kingston Environmental indicated dioxin total equivalents of 23 ppb near the former wood treatment machinery. The BVCP requested further investigation.

The city of Ava proposed construction of a roadway along the east and north borders of the site. Areas of heavy contamination were to be strictly avoided. The department suggested sampling in several areas prior to construction to verify that disturbing soils would not spread contamination.

In July 2000, the EPA initiated a combined Brownfields Targeted Assessment and Removal Assessment investigation to conduct the suggested sampling. This investigation confirmed the presence of elevated levels of dioxin, PCP and PAHs in the soil and sludge from the lagoon area, revealed arsenic contamination in the northeastern portion of the site, and revealed low levels of dioxin and PCP in perched groundwater, creek water and sediments.

The EPA, the department, and the city of Ava

signed an Agreement and Covenant Not To Sue regarding the road and development of the property to the north.

The department conducted an Expanded Site Inspection (ESI) investigation to better define the nature and extent of on- and off-site contamination. The ESI revealed previously unknown areas of contamination. ESI sampling documented PCP and solvents in downstream surface water. While the PCP may be attributable to the site, the solvents are not entirely attributable to Sentinel's wood treating operations. In addition, Ava's Municipal Wells, certain private wells, and a spring were sampled. Three wells had very low detections of PCP below the EPA's Maximum Contaminant Level. As a precaution, all of Ava's four municipal wells are being monitored quarterly to ensure the safety of Ava's public drinking water supply. PCP has not been detected in any of the municipal wells during quarterly monitoring. Sampling in 2002 by the Missouri Department of Health and Senior Services found no traces of PCP or dioxin in the six private wells tested.

On September 17, 2001, the EPA executed an Administrative Order on Consent (AOC) to conduct a time-critical removal action to address the release of PCP from the Sentinel Site to the surface water and groundwater. This AOC required Sentinel to perform response actions that included activating the on-site groundwater diversion system. This system, installed in the late 1970s to divert and collect contaminated groundwater. pumped and treated the contaminated groundwater, and discharged the treated water into the on-site stream. Also, Sentinel was required to secure the site and conduct additional assessment activities to further characterize the wood treating contamination sources. Work started around May 15, 2002.

The community organized a Community Advisory Group. The first meeting took place in April 2002.

Sentinel conducted most time-critical removal activities in 2002, and determined that operating the groundwater diversion system did not significantly reduce the surface water contamination.

Sentinel's consultant submitted an Alternate Time-Critical Removal Action Work Plan and a revised Time-Critical Removal Action and Removal Assessment Report in April 2004.

In May 2004, Sentinel proposed revising its cleanup approach. The revisions included changing the location of the landfarm from the east side of the creek to the west side; excavating and treating the soil from the former treatment plant area in year one; and waiting on excavation and treatment of the upper and lower road soils until year two. Excavation of these contaminated soils and sludge from the former treatment plant area should help meet the compliance in the creek of 1 ppb PCP as required in the AOC. Excavation was initiated in summer 2005.

Treatment of the highly contaminated soils down to removal action levels have been attained in all four batches of contaminated soil. Batch four is currently being managed within the moisture controlled greenhouse biocells. Batches one through three are stockpiled on-site. The first three batches of excavated soil totaled approximately 1,650 cubic yards. During bioremediation, 327 pounds of PCP and 8,169 pounds of diesel were removed from the 1,650 cubic yards of contaminated soil. Immediately offsite, PCP levels in the stream which flows through the center of town have decreased from 250 ppb in 2002 to around 50 as reported in December of 2007. Within a quarter mile downstream, the surface water PCP level reported in December of 2007 rose slightly to 5.56 ppb from less than 1 ppb in both October and April of 2007. EPA's Maximum Contaminant Level (MCL) for PCP is 1.0 ppb. PCP levels in offsite down gradient monitoring wells have decreased from a high of 520 ppb reported in 2002 to 110 ppb by December of 2007. groundwater monitoring wells located directly south of the prior plant location remain elevated with the highest concentration of PCP reported at 5,500 ppb in December of 2007.

It is anticipated that the elevated PCP concentrations reported for wells located near the former location of the plant to start to diminish with the removal of additional soils for biological treatment in the controlled greenhouses.

In October 2013, the front parking lot was partially excavated to remove potential source areas. The excavated soil was sampled and moved to the bio-treatment cell. The sampling results revealed low levels of PCP and TPH-DRO. Maintenance and biological treatment of soils is ongoing. Sampling of monitoring wells on-site occurs bi-annually.

General Geologic and Hydrologic Setting:

The site is located on an upland setting in the hilly Ozark Plateau physiographic province. Soils are composed of cherty, silty clay residuum developed from the underlying bedrock, the Ordovician-age Jefferson City Dolomite. Soil thickness is about 20 feet.

Wells in this area produce water from the Ozark Aquifer which is composed of carbonates and sandstones. The city of Ava has drilled five municipal wells within Section 11. These wells are over 800 feet deep extending into the Gunter Sandstone. Domestic wells in the area extend to depths ranging from 150 to 315 feet. Casing lengths extend from 4 to 294 feet. The Jefferson City Dolomite acts as a leaky confining unit. Contaminants migrating into the subsurface via vertical bedrock fractures or poorlyconstructed wells could move into domestic water sources, depending on groundwater flow direction and the nature of contaminants.

Surface water flows off site to the south, where it enters Prairie Creek. Prairie Creek is a losing stream that flows westward. Contaminants that enter Prairie Creek as runoff may flow several miles to the west reaching the water table along losing segments of Prairie Creek.

Public Drinking Water Advisory:

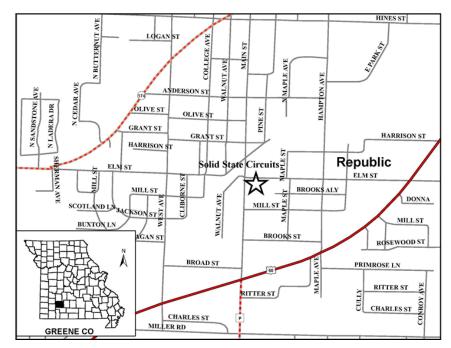
Sentinel Wood Treating is located within the wellhead protection area for four wells serving the city of Ava and one well serving the Fraternal Order of Eagles #3748. The wells serving Ava have been tested and show no sign of contamination. The wells will continue to be monitored as this site is considered a potential source of contamination.

Health Assessment:

Pentachlorophenol (PCP) is a suspected carcinogen. It can irritate the eyes, nose, throat, lungs and skin and can cause chloracne. It is acutely toxic; the lethal human oral dose is about one teaspoon. Arsenic is known to cause skin cancer in humans. Via ingestion, it may cause liver, kidney and bladder cancer. It may cause lung cancer by inhalation. In addition, chronic exposure can cause weight loss, nausea, diarrhea, hyperpigmentation, keratoses, hair loss, and peripheral neuritis. Dioxin is one of the most toxic compounds known: however, its toxicity varies greatly among species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is suspected to cause soft tissue sarcomas, Hodgkin's disease, non-Hodgkin's Lymphoma and porphyria cutanea tarda.

In 2002, the Department of Health and Senior Services sampled eight (8) wells located around this site. No contaminants associated with this site were found in any of the samples, so sampling of the wells was discontinued. In 2005, a bio-treatment cell began processing contaminated soil from the site and is continuing to operate. A fence on all four sides has restricted access to site. A dug pit did have water in it, however, it was not clear if this pit filled up during heavy rain downpours, and what happened to the water in the pit if it escaped. No one was available on site to answer this question.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: Solid State Circuits

Classification: Class 2

Date of Registry Placement: February 22,

1985

Date of NPL Listing: June 10, 1986

<u>Site Address</u>: Southeast corner of the intersection of Elm and Main Streets, Republic, Greene County, Missouri, Brookline Quadrangle

<u>Present Property Owner</u>: Landon Enterprises, Inc. c/o Don Rogers

Lead Agency: DNR

Waste Type: Trichloroethylene (TCE)

Quantity: Not determined

Site Description:

The Solid State Circuits Site (SSC) covers approximately 0.5 acres in downtown Republic and consists of a fenced, graded and landscaped area with one building. The air strippers are housed in this on-site building.

Environmental Problems and Areas of Concern Related to Site:

A fire destroyed the northern portion of the old SSC building in 1979. Rubble was pushed into the basement and the area covered for use as a parking lot. The building's basement contained a well that served as a pathway for TCE to enter groundwater. After TCE was detected in Municipal Well No. 1 (CW-1), the northern portion was reopened and extensive contamination was discovered.

Three groundwater systems underlie the site: (1) the Unconsolidated/Fractured Shallow Bedrock System (UFSB), (2) the Shallow Bedrock Aquifer (SBR), and (3) the Deep Bedrock Aquifer (DBR). All three have been contaminated with volatile organic compounds, primarily TCE. The DBR is the primary source of drinking water for the city of Republic. The basement well in the old SSC building served as a direct pathway for TCE to enter the DBR.

Of Republic's three original municipal wells, only CW-1 was closed due to TCE contamination. To date, this was the only well impacted by the site-related TCE. Since no private wells exist near the site, no one is

currently exposed to contaminated groundwater. Municipal Well No. 2 (CW-2), located 2,100 feet east-southeast of the site. was closed in the fall of 1997 due to non siterelated issues. Municipal Well No. 3 (CW-3) is 4.900 feet northeast of the site. Municipal Wells Nos. 4 (CW-4) and 5 (CW-5) were constructed and brought on-line by 1988. CW-3, CW-4, and CW-5, which draw water from the DBR, serve the city of Republic and are monitored regularly by Missouri Department of Natural Resources (MDNR) personnel. In July 2007, Municipal Well #6 (CW-6) went online in the consolidated area of Republic-Brookline. Joint annual site inspections and groundwater sampling events for the SSC site will also continue.

Remedial Actions at Site:

Following identification and confirmation of the contamination source, the MDNR and the U.S. Environmental Protection Agency (EPA) completed a number of removal actions. More than 2,000 cubic yards of contaminated material from inside the basement foundation was excavated and disposed at a permitted hazardous waste disposal facility. The basement's well, which served as a conduit for contaminant migration, was plugged to prevent the further spread of contaminants.

On August 26, 1983, the MDNR notified the property owner that the site was proposed for the "Registry." The owner appealed and an agreement was reached. The SSC site was place on the "Registry" on February 22, 1985. The EPA proposed the SSC site for listing on the National Priorities List (NPL) on October 15, 1984. The site was placed on the NPL on June 10, 1986.

A Remedial Investigation/Feasibility Study (RI/FS) was completed by SSC with MDNR oversight in the summer of 1989. The RI identified plumes of TCE contamination in the groundwater in each of the three hydrologic systems underlying the site.

On August 14, 1989, the RI/FS and the Proposed Plan (PP) were released to the public for review and comment. The FS evaluated four remedial alternatives, including the 'no action' alternative. After considering the public's comments, the EPA, with MDNR

concurrence, selected a remedial action (RA) to be implemented at the site. The Record of Decision (ROD) was signed on September 27, 1989.

The selected remedy in the ROD included: (1) extraction of the contaminated groundwater by using existing and new wells; (2) on-site treatment of the extracted groundwater using the two existing air strippers; (3) discharge of treated water to the city of Republic's sewer system to receive further treatment at the Publicly Owned Treatment Works; (4) a municipal ordinance to prevent construction of drinking wells in or near the contaminated groundwater plumes; and (5) continued monitoring to determine the effectiveness of the remedy.

The EPA invited SSC to participate in formal negotiations for a settlement to conduct or finance the RD/RA at the site in accordance with the ROD. From December 1989 through May 1990, SSC, the EPA, and the MDNR negotiated the terms of a Consent Decree/ Statement of Work (CD/SOW) for the Remedial Design/Remedial Action (RD/RA). SSC signed the CD on July 2, 1990. It was entered with the court on May 31, 1991.

The Pilot Remediation Program, which began in September 1991, consisted of on-site treatment of the extracted groundwater using air strippers. It was completed in January 1992. The removal effectiveness of TCE was determined to be 98 to 99 percent.

In December 1992, the MDNR and the EPA reviewed and approved the RD proposal for the cleanup of the groundwater. RA construction began in early 1993, and was completed by SSC with MDNR oversight in December 1993.

Groundwater extraction from each of the three hydrogeologic systems and remediation via the pump and treat system began after construction. In May 1994, the MDNR and the EPA jointly determined that the remedy was operational, functional and performing as designed. The estimated time it will take to remediate the site is 20 to 40 years.

The first Five-Year Review (FYR) was completed in 1996. The second FYR was

was completed in 2002. Both reviews determined that the remedial action and the ongoing operation, maintenance, and monitoring at the site were functioning and performing as designed, and continued to be protective of human health and the environment.

A horizontal well was constructed in April 1998. Multiple tests, including a yearlong pilot project, were done to determine the well's viability. The pilot project was completed in December 2002. Data and information from the year-long pilot project and tests determined the horizontal well aided in the TCE removal within the UFSB system. The agencies granted conditional approval in June 2003. On September 29, 2004, EPA with state concurrence signed the Explanation of Significant Differences (ESD) for the SSC site. The ESD granted a permanent modification to the extraction system.

The third FYR was completed by the EPA in September 2007. The third FYR determined the remedial action was functioning as intended and was meeting the performance criteria of the Consent Decree; however, two issues were identified that needed further assessment and evaluation. The two issues were evaluated and partially resolved.

A fire occurred on December 8, 2011, that totally destroyed the groundwater remedial action treatment (pump and treat) facility, creating a Force Majeure/Excusable Delay (FM/ED) situation. The Agencies and the RP negotiated and signed a FM/ED Agreement on June 15, 2012. Work is ongoing under the FM/ED Agreement.

The Department completed and the EPA concurred with the fourth FYR Report in September 2012. Based on the data and information documented in the fourth FYR Report, a protectiveness determination could not be made until further data and information was obtained. Currently, the RP is obtaining that data and information through additional site-related field work under the FM/ED Agreement. Once complete, a protectiveness determination will be made regarding the site.

General Geologic and Hydrologic Setting:

The SSC site is located in a broad, upland setting with regional karst development. Small spring and cave systems exist in and around the city of Republic. Rocks of Mississippian- and Ordovician-age underlie most of the region. The subsurface geologic units have been divided into three hydrostratigraphic layers: the UFSB, the SBR, and the DBR.

The UFSB includes 10 to 20 feet of stony, red, clay residuum and about 75 feet of Mississippian-age Burlington-Keokuk Limestone, consisting of weathered and fractured, cherty limestone. This zone is moderately to highly permeable, with fractures that have provided avenues of rapid fluid transport to groundwater. Regional groundwater flow of the UFSB is south-southeast toward the Schuyler Creek drainage system. Perched water is thought to be present at the soil-bedrock contact.

The SBR includes the lower, unfractured Mississippian-age Burlington-Keokuk Limestone, which ranges from about 75 feet to 300 feet below the surface. Regional groundwater flow in the SBR is toward the southeast.

The DBR includes deep, Ordovician-age dolomite and sandstone bedrock below a confining unit, which is present at depths of over 300 feet.

All three of the hydrologic systems were affected at this site. Primary routes of contaminant migration are along fractures in the shallow aquifer. The deeper aquifer was contaminated by migration down an abandoned well that penetrated the confining layer.

Public Water Drinking Water Advisory:

TCE from the site has contaminated the groundwater, including the aquifer that serves as the source of water for the city of Republic, via an abandoned on-site well. Two of the three water supply wells for the city of Republic are located within 4,900 feet of the site. The wells are 1,000 to 1,230 feet in depth, with 300 to 451 feet of casing, and are

constructed into consolidated geologic formations. No private wells are located in the vicinity.

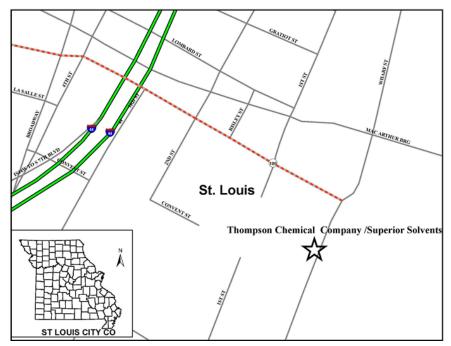
Health Assessment:

A health threat exists at this site due to the carcinogenic nature of TCE, the proximity of the facility to city residences, and the previous contamination of the city's drinking water supply. The predominant health response from exposure to TCE is central nervous system depression. Some indication of injury to the liver and kidneys may also be observed, and TCE has been shown to be carcinogenic in animals.

The exposure route of greatest concern is ingestion of contaminated groundwater, although private well sampling does not indicate that this is presently occurring. Samples collected from 2002, through 2012, by the Missouri Department of Health and Senior Services, from private wells at the southern and southeastern edges of town, did not detect TCE or its breakdown products. However, there is potential for TCE contamination through routes not previously identified.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Thompson Chemical/Superior Solvents



<u>Site Name</u>: Thompson Chemical/Superior Solvents

Classification: Class 2

<u>Date of Registry Placement</u>: September 23, 1986

Site Address: 60 Chouteau Avenue,

St. Louis, Missouri

<u>Present Property Owners</u>: Superior Solvent and Chemicals, a subsidiary of Superior Oil Company of Indianapolis. Indiana

Lead Agency: EPA

<u>Waste Type</u>: Polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs) 2,3,7,8-TCDD (dioxin), and semi-volatile organic compounds (SVOCs).

Quantity: Not determined

Site Description:

This site is located near the west bank of the Mississippi River in a historically industrial area of the city of St. Louis. Part of the site was used by Thompson Chemical Company

where it produced Agent Orange from about 1950 to 1968. A part of the property was used by Wood Treating Chemicals Company which formulated pentachlorophenol (PCP). Dioxin which is a waste byproduct from the production of Agent Orange, VOCs, and PAHs have been found at the site. Superior Solvents currently operates an active solvent distribution business at the site. The site property is about three acres. The site is secured with fencing.

Environmental Problems and Areas of Concern Related to Site:

Off-site exposure of pedestrians and on and off-site exposure of industrial workers to surface and subsurface contamination is possible. Also, the ecosystem in the Mississippi River could be exposed to contaminants due to the site's proximity to the river.

Remedial Actions at Site:

The U.S. Environmental Protection Agency (EPA) completed a Preliminary Assessment in June and a Site Investigation in October of 1984. Sampling identified the presence of contaminants in soil and a leaking underground storage tank (UST) was

Identified. Dioxin was found in soils ranging from 1 part per billion (ppb) to 160 ppb.

In 1987, the EPA conducted additional sampling and found contamination seeps in the Mill Creek Trunkline Sewer. Also in 1987, the Responsible Party conducted a site removal, including excavation of the UST contents and surrounding soils. The contaminated soils were stored on site in 13 roll-off boxes, which remain on site.

The EE/CA was approved in July 2006. An Action Memorandum was signed by the EPA on July 13, 2006. The EPA issued a draft Administrative Settlement Agreement and Order on Consent (ASAOC) for Removal Action on June 1, 2007. On August 17, 2007. the RPs submitted a revised ASAOC for Agency review. The EPA continued to negotiate with the RPs to implement the removal action as defined in the Action Memorandum: 1) properly dispose of the onsite roll-off boxes and drums, and 2) excavate contaminated on-site berm soils and properly dispose. The ASAOC was approved and signed by the RPs and the EPA on July 23, 2013. The removal action field work began on August 26, 2013, and was completed on November 13, 2013. The Final Removal Action Report was approved on January 24, 2014.

General Geologic and Hydrologic Setting:

This site is approximately 300 feet west of the Mississippi River. This area is an alluvial remnant of the Mississippi River, altered by man-made fill material. Man-made levees to the east provide partial protection from floodwaters. Surface drainage and storm sewers flow to the east and enter the Mississippi River within 400 feet. Numerous sinkholes exist west of this site where the Mississippian-age bedrock lies close to the surface.

The subsurface soils consist of an upper zone of man-made fill and debris from the existing ground surface to a depth of 18 to 23 feet. The extremely heterogeneous fill is composed of dirt, cinders, brick, scrap concrete and other debris. Permeability in this unconsolidated zone is expected to be relatively high.

About 35 feet of alluvial clay, silt and sand underlie the fill material. The upper cyclic strata of silts and clays (10 to 15 feet thick) are underlain by fine- to medium-grained alluvial sand, with some gravel, cobbles and clay seams. The sand stratum, which varies in thickness from about 10 to 20 feet, appears to slope eastward toward the Mississippi River and is probably exposed in the river bed. Permeability of the sand varies considerably; consequently, a corresponding variation occurs in the rate of groundwater flow in the alluvium.

The St. Louis Limestone underlies the unconsolidated material on site at an approximate depth of 50 feet below the surface. Karst features have developed in this unit to the west of the alluvial area.

Most water movement is to the east, toward the Mississippi River via surface drainage or through permeable alluvium. The potential for infiltration into shallow alluvial groundwater supplies is high. The risk to bedrock groundwater supplies is reduced since the site is located in a discharge environment. However, groundwater supplies in the shallow bedrock could be affected by dense non-aqueous phase contaminants in high concentrations.

Public Drinking Water Advisory:

The area is served by the St. Louis City Water Department which uses the Missouri River and the Mississippi River as sources. The water intake on the Mississippi River is located upstream of the Thompson Chemical site. The site poses little threat to the public water supply.

Health Assessment:

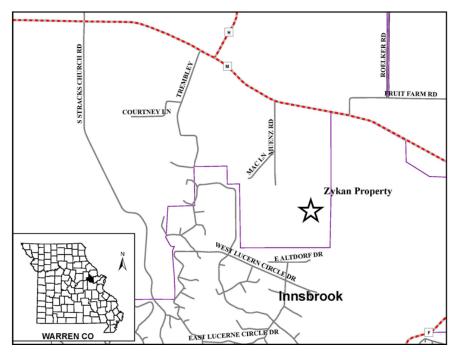
Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's Lymphoma, Hodgkin's disease and porphyria cutanea tarda.

The site is fenced and secured to prevent public access, and the contaminated soil is covered by asphalt. Contaminants could possibly reach the river, either through the groundwater or through the sewer system.

However, the Missouri Department of Health and Senior Services is not aware of groundwater use for drinking purposes in this area.

Based on available information, the site poses a health risk. While the site has been capped, the contaminated soil beneath the cap may still be mobile. Although now remediated, the site once contaminated the adjacent Mill Creek sewer.

Zykan Property



<u>Site Name</u>: Zykan Property (Bob's Home Service Landfill and Zykan Landfill)

Classification: Class 2

Date of Registry Placement: July 1, 1985

Site Address: 1252 Muenz Road, Wright City, Warren County, Missouri, S 1/2, S 1/4, Sec. 32, T. 47N, R. 1W, Wright City

Quadrangle

<u>Present Property Owner</u>: LaVerne A. Zykan

Trust

Lead Agency: DNR

<u>Waste Type</u>: Inorganics, organics, heavy metals, paints, pigments, pesticides, and ignitable waste

Quantity: Not determined

Site Description:

The 158-acre site includes a residence, crop land, and two former landfills. The site is located about three miles southwest of Wright City. The former sanitary landfill, known as Zykan Landfill, consists of about five acres. The other former landfill, Bob's Home Service

(BHS) Landfill, consists of about 12 acres north of Zykan Landfill. BHS is a closed federal interim status hazardous waste landfill.

Zykan Landfill, formerly permitted as Bob's Home Service, Inc., Sanitary Landfill, is a closed sanitary waste disposal facility that operated from about 1971 to 1977. Between 1971 and 1977, materials disposed at the Zykan Sanitary Landfill included miscellaneous trash, household garbage and unidentified industrial wastes. Since its closing, many of the suspected industrial wastes have been classified as hazardous substances. Some wastes disposed at the Zykan Site are similar to the wastes disposed at BHS.

In 1977, BHS, Inc. opened a 9 acre industrial landfill referred to as Area 1 that operated until 1982. In 1982, BHS, Inc. managed a 2-3 acre portion of the site known as the Progressive Trench Area (PTA). The PTA operated under federal interim status and a state hazardous waste permit until about 1985. During the operation of the PTA landfill, BHS, Inc. was required to pay into a post-closure trust an amount equal to the amount of the closure and post-closure estimate. BHS, Inc. failed to fully fund the trust. In 1986, the facility closed under a closure and post-closure plan

approved by the Missouri Department of Natural Resources (the department). In an effort to maintain the landfill, a consultant was contracted by LaVerne Zykan, president of BHS, Inc., to take care of minimal post-closure maintenance. The reimbursement of these activities has been paid out of the partially funded post-closure trust fund since 1996. The trust fund is nearly depleted.

A portion of the area has chain-link fencing. The road leading into the BHS Landfill has a locked gate, and a "No Trespassing" sign is posted.

Environmental Problems and Areas of Concern Related to Site:

Hazardous waste remains buried in the Zykan Sanitary landfill. A fair to good stand of vegetative cover exists on the landfill's cap and most slopes.

In February 2002, a fire at the BHS Landfill burned a storage building, waste tires and miscellaneous scrap and debris. About 50 to 100 tires and debris remain on site.

In May 2003, a Solid Waste annual inspection was done at the Zykan landfill. Leachate outbreak on the southern slope was noted. The leachate outbreak was sampled in October 2003. The results indicate no contamination in the leachate.

In May 2004, groundwater monitoring and leachate removal was performed at BHS Landfill. Approximately 10,000 gallons of leachate were removed from the leachate collection sump and disposed of off-site at a permitted waste facility. Leachate continues to accumulate in the sump. Past groundwater monitoring results indicate volatile organic analysis (VOA) contamination in a couple wells to the north of the BHS landfill.

The department's Hazardous Waste Program (HWP) requested the department's Environmental Services Program (ESP) to conduct a site investigation at the Bob's Home Service (Zykan Property) site as part of a 128a Brownfields Grant. In April and May 2005, ESP installed two microwells to the north of the BHS Landfill and also collected

several soil, surface water and groundwater samples. The soil samples focused on former waste management units that include former surface impoundments #1, #3, and #4. Surface impoundment #2 was not accessible for soil samples. The surface water samples were collected along the adjacent creek, from surface impoundment #2, and at a private lake to the north of the site. All samples were analyzed for VOAs, base neutrals/acid extractables (BNAs), pesticides/herbicides, and total metals (As, Ag, Cd, Se, Ba, Pb, Hg, and Cr). Soil from the leachate outbreak was also collected and analyzed.

In August and September 2008, 10,000 gallons of leachate were removed from the BHS leachate collection sump. Also in September 2008, groundwater was sampled in 13 monitoring wells. The results indicate that there are several wells with groundwater contamination above EPA Region III risk based numbers. The constituents above the risk based numbers are: vinyl chloride, bis(2-ethylhexyl) phthalate, arsenic, cadmium, chromium, and lead. Groundwater sampling and leachate removal will continue as funds become available for the site.

Remedial Actions at Site:

At this time, no remedial actions have been necessary at the BHS Landfill.

From 1971 to 1977, a portion of the Zykan property was operated as a sanitary and industrial landfill. This landfill was closed, capped and vegetated when the hazardous waste landfill began operation on July 8, 1977. Post-closure inspections of Zykan Landfill revealed erosion and leachate outbreaks. Severe erosion was noted on the cap and southern slope. Leachate outbreaks, confined to the southern slope, discharged into a tributary of Charrette Creek. During a May 1981 inspection, leachate sampling revealed volatile organic compounds (VOCs), solvents, napthalene, and phenols in the leachate.

The U.S. Environmental Protection Agency (EPA) inspected Zykan Landfill in 1991, and documented the leachate outbreak and erosion. The EPA instructed the owners to correct these problems. Since no action was

taken, the EPA issued a Notice of Violation (NOV) in November 1991.

In January 1992, the EPA referred Zykan Landfill to the department's St. Louis Regional Office (SLRO) Enforcement Section. Since the owner was financially insolvent, legal actions were not pursued.

From January 1992 through 1995, yearly closure site inspections revealed no remedial actions were undertaken to correct the ongoing leachate outbreak and eroded gullies at Zykan Landfill. The SLRO issued a Notice of Violation in June 1995. The department completed a Preliminary Assessment/Site Inspection on August 30, 1995.

The 1996 Registry inspection of Zykan Landfill revealed exposed drums in a drainage ditch leading to Charrette Creek and a leachate outbreak on the south slope. Repairs and drum overpacking were completed in summer 1996. On August 30, 1996, the department completed an Integrated Preliminary Assessment/Site Inspection Report recommending an EPA Removal Action. An Action Memorandum was signed on September 29, 1997, for a Time-Critical Removal Action. Field activities began October 1997 and were completed in February 1998. A Public Availability Session was held on November 13, 1997.

Wet weather conditions prevented the spring 1998 regrading and seeding of Zykan Landfill. After regrading the areas disturbed during the removal, hydroseeding was conducted in the fall of 1998.

The EPA obtained a 12-month statutory exemption in January 1999 due to Zykan Landfill's maintenance and security problems. It was continued until April 2000. During that time, security was re-established with a new fence and gate system. Eroded gullies that had developed due to a lack of vegetation were repaired. The site was reseeded in the fall of 1999.

The EPA initiated an Expanded Site Investigation (ESI) in June 1997. The purpose of the ESI was to assess the threat Zykan Landfill posed to human health and the environment via surface water and

groundwater. The ESI was completed on September 29, 1999. Due to previous removal activities, the ESI concluded that the site currently posed minimal or no threat to human health and the environment.

In 2005, the department received a 128a Brownfields Assessment Grant from the EPA to conduct additional groundwater, soil, and surface water sampling and investigation at the adjacent Bob's Home Service hazardous waste landfill. The sampling included a soil sample at the leachate outbreak on the south slope of the Zykan Landfill as well as a surface water sampling in the creek dowstream of the site and in the lake north of the site.

General Geologic and Hydrologic Setting:

The site is located in an upland setting in the watershed of a tributary to Charrette Creek. On-site soils are composed of 10 to 20 feet of loess overlying thick deposits of glacial drift. The upper 50 to 75 feet of drift is composed of till which is characterized by dense, low permeability sandy and silty clay. This material is expected to provide an effective barrier to downward percolation of contaminants. Therefore, lateral leakage from the filled areas is the primary concern.

Groundwater supplies within the glacial till are extremely limited. Natural conditions are well suited for preventing contamination of drinking water supplies.

Public Drinking Water Advisory:

There are numerous public wells within three miles of this site. The nearest well is one mile to the southwest and serves St. Charles Co. Public Water Supply District #2. Other public systems nearby include a second well serving St. Charles Co. PWSD #2, Maple Ridge Mobile Home Park, Innsbrook Estates Subdivision, Valley Lake Estates, Oakview Estates, Midway Mobile Home Park, four wells serving Wright City, Child Evangelism school, and Glenbrook Estates.

The Zykan site may pose a potential threat to nearby wells due to the quantity and type of wastes present, however, natural geologic conditions tend to lessen the possibility of contamination.

Health Assessment:

Depending on the concentrations and amount of exposure, all the landfill wastes can produce symptoms ranging from mild to severe affecting virtually all systems of the body. Exposure to high concentrations for short periods usually produces acute symptoms that may be as mild as a rash or as severe as death. Exposure to low concentrations for prolonged periods of time usually produces chronic symptoms. These symptoms may also range from low levels of discomfort to severe irreversible damage and death.

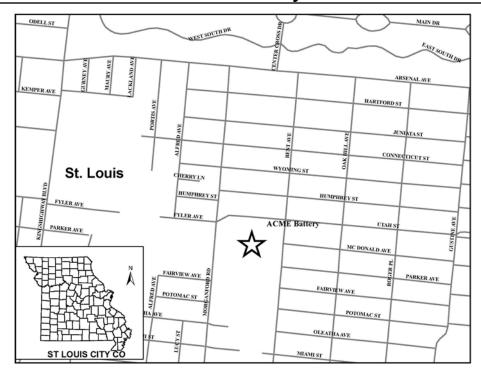
The Missouri Department of Health and Senior Services (DHSS) is engaged in ongoing surveillance of private drinking water wells in the area surrounding the BHS-Zykan Landfills. This surveillance has so far revealed no drinking water contamination. The latest round of sampling was conducted in November 2005. DHSS identified two private wells in the direction of groundwater flow from the site. DHSS considered these wells too far away to be impacted by site wastes because of the slow rate of groundwater movement. DHSS has discontinued our private well sampling in this area because of the slow groundwater movement from the site and the lack of drinking water contamination in sampled

wells. Sampling may be continued if more housing developments reach this area.

Year after year, the department continues to identify leachate outbreak on the south slope of the landfill. Although the leachate has not discharged offsite, the potential does exist, particularly during wet weather. The department has suggested to the owner that the area should be dug out, recompacted with clay, and re-seeded. The owner needs to address this problem to prevent on-site exposures to toxic wastes.

Based on available information, because the area is fenced, no current exposure to hazardous substances exists at the Zykan Property Site. However, because of the unknown types and concentrations of hazardous substances possibly deposited at this site including a large amount of metal and debris located north of the landfill, a potential health risk must be presumed, as the potential exists for contaminants to migrate into the environment.

CLASS 3 SITES



Site Name: ACME Battery

Classification: Class 3

Date of Registry Placement: December 19,

1996

Site Address: 3340 Morganford Road, St.

Louis, Missouri

Present Property Owners: Remains, Inc.

Lead Agency: DNR

Waste Type: Heavy metals (lead)

Quantity: Not determined

Site Description:

The ACME Battery Site was a former battery manufacturing plant that operated from 1963 until May 1997. The property is in a commercial/light industrial area in close proximity to residential areas. A September 1987 fire damaged much of the manufacturing and storage area and contaminated soils and debris with high levels of lead. The site is fenced and Remains, Inc. occupies a portion of one building. The remaining buildings are vacant.

Environmental Problems and Areas of Concern Related to Site:

Lead concentrations in soil range from 400 to 37,500 parts per million (ppm). Leachable lead was documented in on-site soil in an uncapped area. Water and soil in the same area exhibited very low pH (highly acidic). Potential weather conditions, such as heavy rain or wind during dry periods, pose an ongoing threat of releases and migration of hazardous substances.

Remedial Actions at Site:

During a 1988 Site Inspection, the U.S. Environmental Protection Agency (EPA) discovered high lead levels in soil. In 1993, ACME entered into an AOC with EPA to address this lead contamination. In 1994, ACME capped a portion of the site and agreed to place a deed restriction on the capped area and maintain the integrity of the cap.

In fall 1996, the Missouri Department of Natural Resources (the department) responded to a complaint that lead was migrating to the adjacent International Foods property. Department sampling in March 1997 documented highly elevated lead levels and very low pH in both soil and surface water samples. In fall 1997, International Foods completed remediation efforts under the department's Brownfields Voluntary Cleanup Program's (BVCP) oversight to remove lead-contaminated and acidic soil from its property. The data suggested that the contamination was due to highly acidic, lead-contaminated materials migrating from the ACME Site. A railroad tie retaining wall was constructed, and limestone was applied to prevent additional materials from washing off the ACME Site onto International Foods property.

In December 1997, ACME petitioned the department for a change in site classification after the site was assigned to Class I. ACME submitted documentation that in October 1997, all storage and handling tanks were washed and prepared for sale, all transfer lines were purged and washed, below grade lines were capped, and the source of the acid release was removed. About 2,000 gallons of acid, remaining when operations were discontinued, was shipped to Big River Zinc in November 1997. The department denied ACME's petition because the work was completed after the end of that fiscal year.

On June 15, 1998, the department's Hazardous Waste Program Enforcement Section issued ACME a Notice of Violation (NOV) for failure to determine if waste observed in two on-site dumpsters was hazardous. Soil was stockpiled in these dumpsters following a sewer repair project while the company was still operating. The department suspected that the soil contained high levels of lead. ACME responded to the NOV on July 1, 1998 with results indicating that the soil in the two dumpsters failed the Toxicity Characteristic Leaching Procedure (TCLP) for lead. The soil from the dumpster was then moved to roll-off containers. A Letter of Warning and an NOV were issued on July 22, 1998, for storage of hazardous waste for greater than 90 days; failure to keep hazardous waste containers closed: failure to mark containers with the words "Hazardous Waste"; failure to package, mark, or label per Department of Transportation regulations during the entire on-site storage period; and failure to mark the date of accumulation on the container. The owner reported to the department that ACME is defunct, has no

assets, and therefore, was unable to perform appropriate response actions. The discovery of a previously unknown, uncharacterized area on the south side of the property, between ACME and adjacent property owned by School Services, led the department to sample the soil in that area on August 5, 1998. Three of eight samples contained lead above health-based screening levels and failed TCLP. Results were as high as 18,100 ppm and 413 ppm lead.

The state filed suit against ACME Battery in St. Louis City Circuit Court for violations of the Missouri Hazardous Waste Management Law. The case was settled on August 14, 2000. The terms of the settlement included ACME's commitment to remove and properly dispose of the roll-off containers with characteristic hazardous waste. Envirotech. Inc., a local environmental contractor, removed the rolloffs and contents for ACME in fall 2000. The department initiated a Site Reassessment (SR) to fully characterize the site and resolve outstanding concerns regarding the leachable lead in one area and migration of potentially acidic runoff onto neighboring property. Neither of these were addressed by the removal action conducted in 1994.

During the May 2000 annual inspection, the department learned that ACME Battery had given Envirotech permission to use the on-site building for office and warehouse space. However, the company had no formal occupancy agreement such as a lease. The department initiated a worker safety assessment because the change of use was not authorized under the Registry law.

After ACME Battery failed to pay property taxes, the city of St. Louis offered the property for sale at a tax auction in July 2000. No bids were received, so ownership was transferred to the St. Louis Development Corporation (SLDC)/Land Reutilization Authority. Lead wipe samples were collected from the building on August 2, 2000, to determine if the new building occupants were exposed to lead at levels of concern in building dust. The wipe sample collected from the office kitchenette floor contained lead at 64 times the residential exposure screening levels, and in the warehouse ranging from 910 to 29,635 times the residential exposure screening levels.

Due to the health risk to workers posed by the high concentrations of lead in building dust, the Missouri Department of Health and Senior Services recommended that the company vacate the building. In November 2000, SLDC evicted Envirotech. After numerous appeals and extensions, Envirotech moved out on June 22, 2001.

The SR, completed October 31, 2001, confirmed findings of previous investigations. Elevated lead concentrations remain in soil, sediment, surface water, and interior building surfaces. No complete exposure pathways were identified. The SR recommended no further action under CERCLA authority at this time based on current conditions and the absence of on-site workers, but made recommendations should the property be voluntarily remediated in the future.

The SLDC applied for enrollment of this site in the BVCP in November 2003. SLDC applied to EPA for and was granted a Targeted Brownfield Assessment (TBA) of the property. The TBA, which included soil, drum, debris, wipe and groundwater sampling, was completed by an EPA contractor in January 2004 to identify areas that need to be addressed when the site is redeveloped. Follow-up groundwater sampling was conducted in June 2004. The BVCP and the SLDC agreed in principle on the general scope of the work needed for risk-based closure of the site through the BVCP once a developer purchases the property for redevelopment.

In January 2005, Remains, Inc. purchased the property from SLDC and continued the site's participation in the BVCP. Remains plans to conduct remedial activities in a phased approach, beginning with the north parcel.

The BVCP approved work plans to repair the engineered asphalt cap and to decontaminate the east end of the office/manufacturing building in April and May 2005, respectively. Implementation of the work plans began in June 2005. Debris accumulated in the cracks in the asphalt cap was removed, the cracks were repaired, and the entire cap was resealed with asphalt sealer. An uncapped area in the southeast corner of the parking lot was sampled and found to contain elevated

lead concentrations in the soil. The lead-contaminated soil was removed and the area was backfilled with asphalt chips that had been stockpiled on site. Roll-off boxes from previous owners were tested, contaminated materials removed and repackaged for proper disposal, and the boxes were decontaminated and removed from the site. Interior decontamination in the east end of the office/manufacturing building was completed in December 2005.

All final clearance samples from the east end of the building were below the established target levels. The west end of the building (office) will be decontaminated and demolished as a separate project at a later date. Therefore, the physical barrier separating the contaminated, west end of the building will remain intact to prevent human exposure to the lead contamination. In March 2006, Remains, Inc. submitted a change of use request for approval to occupy the eastern high-bay portion of the building and install new process machinery to support expanding operations. Approximately 10 to 15 people will be working in this area. The change was approved April 2006.

Remains received department approval to construct a covered loading dock with an overhead garage door and two recessed dock pits on the east end of the building on the 3340 parcel. Due to the potential to encounter lead-contaminated soil and building debris during construction of the proposed loading dock, Remains conducted a limited subsurface investigation, in accordance with a department-approved work plan, to determine the presence and extent of lead-contamination in this area. Analytical results documented the presence of lead at concentrations above applicable Tier 1 RBTLs. Five samples were determined to be above the TCLP regulatory limit for lead and would be considered hazardous for disposal characterization. Therefore, to stabilize the lead and render it nonhazardous, the fill material and soils scheduled for excavation for the loading dock construction were treated in-situ with triple super phosphate, excavated, and disposed as special waste. The loading docks were completed in May 2007. The concrete and asphalt paving of the loading dock area serves as an adequate cap to prevent direct

exposure to any remaining lead contamination in that area.

The BVCP approved a work plan to decontaminate the west end of the office/ manufacturing building and to close the underground storage tank (UST) located on the south side of the office/manufacturing building in January and February 2007, respectively. The work plan for cleaning and decontamination of the building includes removal of debris, removal of lead dust by HEPA vacuuming, pressure washing, and encapsulation. The UST closure work plan calls for removing all remaining product and water from the UST for disposal. The UST will be exposed by removing the surface concrete for access and to determine the size and orientation of the tank. The tank will be opened, the interior cleaned, and remaining sludge removed, containerized, and disposed. Based on the tank orientation, it will be removed or closed in place. Soil and groundwater samples will be collected during closure activities. These activities have not yet been conducted.

The asphalt-capped eastern portion of the property is no longer being used for school bus parking by Durham Bus Services. In August 2010, Remains requested and the department approved a change of use to construct a semi-permanent fabric-covered structure in this area to be used for textile storage. A concrete foundation wall was constructed to level the area for construction of the fabric-covered structure.

The BVCP approved a new work plan to close the UST in July 2013, which supersedes the plan approved in 2007. The UST will either be removed or closed in place, depending on its size and orientation (currently unknown). Remains, Inc. now plans to demolish the west side of the office/manufacturing building, and build a new structure in its place. The BVCP approved a work plan for management of contaminated soil related to the current building demolition and construction of footings and a floor slab for the eventual new western half of the building. A Remedial Action Plan (RAP) for abatement of asbestoscontaining materials (ACM) in the portion of the office/manufacturing building to be demolished was approved by the BVCP in

June 2014. ACM abatement activities are scheduled to occur in late August/early September 2014. After the abatement, demolition is anticipated to occur, followed by closure of the UST and construction of a new building slab in place of the demolished half of the building, to be conducted in accordance with plans the BVCP approved in July 2013.

General Geologic and Hydrologic Setting:

The site is located on gently rolling uplands consisting of wind-blown loess, a soil that exhibits low to moderate permeability. A thin zone of residual clay soil, developed from the underlying bedrock, occurs at 20 to 30 feet below grade. Bedrock, composed of undifferentiated Pennsylvanian-age shale, coal and sandstone, is present to a depth of about 60 feet below grade. Coal and clay were mined from the Pennsylvanian units. Thick sequences of Mississippian-age and older limestone formations occur at greater depths. Solution enlargement of bedding planes and joints is common in the limestone units. Extensive grading produced a flat terrain. which tends to pond water, allowing infiltration through the surface soil. Infiltrated water could enter the artificially-created (mined) conduits within the uppermost bedrock, rapidly impacting the underlying aquifer.

Some low-yield wells in the St. Louis area produce potable water from the Mississippian bedrock aquifer. Water from underlying bedrock units is mineralized and is not used.

Public Drinking Water Advisory:

The city of St. Louis is served by public drinking water from the Missouri, Mississippi and Meramec Rivers. No public drinking water sources are expected to be affected.

Health Assessment:

The primary health concern is human exposure from ingestion of lead contaminated soil and inhalation of lead dust. Lead attacks the kidneys, blood, gingival tissue, gastrointestinal tract, and central nervous system. Prolonged exposure to elevated levels causes decreased IQs and behavioral problems in children. Lead can also cause neuromuscular effects and high blood

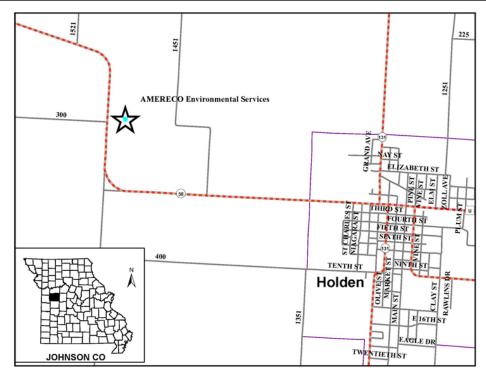
pressure in adults.

Although no remedial activities have occurred on site since 2007, a part of the building was cleaned to commercial standards and is currently occupied. The other part of the building is sealed from access, pending funding for cleanup. Following recent 2013 asbestos abatement in the sealed off portion of the building, demolition has been planned in preparation for the pouring of a new slab for eventual reconstruction. Areas of exposed dirt were capped with concrete and asphalt, the site is fenced off and gated with a chain lock, thus restricting access and ensuring that no off-site dust migration is occurring. Some of the inner fencing of the previously leased area has been removed. The site continues to be monitored to ensure the integrity of the cap.

The neighboring property (International Foods) was remediated under the BVCP's oversight, which included soil removal to reduce exposure to workers.

Although residual contamination still remains at the site and may pose potential risks, these actions in their totality have significantly reduced opportunities for immediate direct exposure on- and off-site. The site does not therefore, currently pose unacceptable health risks and in light of the site improvements, DHSS does not consider the site as currently presenting direct substantial health risk.

AMERECO Environmental Services



Site Name: AMERECO Environmental

Services

Classification: Class 3

<u>Date of Registry Placement</u>: September 10,

2003

Address: 1483 SW 58 Highway, Kingsville,

Johnson County, MO

Present Property Owner: Jared Sisk

Lead Agency: DNR

Waste Type: Metals (cadmium, chromium,

lead), PCBs, SVOCs, VOCs

Quantity: not determined

Site Description:

AMERECO Environmental Services (AMERECO), also known as West Star Environmental, Inc., is a former hazardous waste treatment, storage and disposal (TSD) facility. The site has operated under various owners and has had multiple company names (i.e., PCB Disposal Systems; AMERECO; Essex Waste Management Facility; and West Star Environmental, Inc.) The facility accepted

a variety of hazardous and non-hazardous waste from off-site sources for storage, treatment, and brokering to other facilities. The site has a long and complex history of violations and corrective action under the Resource Conservation and Recovery Act (RCRA) Program, including a pending lawsuit. The department revoked the operating permit for the facility in 2000. Because West Star failed to begin proper closure activities as ordered by the Hazardous Waste Management Commission (HWMC), the department initiated closure.

In 2002, Johnson County acquired the West Star property from president and owner, Mr. William Kadri, due to delinquent taxes on the property. On August 26, 2002, Mr. Jared Sisk purchased the tax liability and the property and took possession of the property in August 2004.

Although the West Star facility no longer operates, several buildings remain on site. The southern end of the building contains several aboveground storage tanks (ASTs) located in a secondary containment structure.

Environmental Problems and Areas of Concern Related to Site:

The listed hazardous waste has been documented on site. In addition, the site has been the subject of continuing violations and enforcement activities throughout its history.

West Pin Oak Creek is located within 100 feet of the site. The hazardous waste remaining on site could impact the creek if any leaks or spills occurred.

Remedial Action at the Site:

Because of the continuing violations, the department issued a Notice. Order to Close and Permit Revocation to West Star on July 6, 2000. Although West Star appealed the Order, the HWMC confirmed in June 2002. that West Star must close according to the Order. West Star did not begin closure of the facility as directed by the HWMC. Consequently, the Department of Natural Resources initiated actions to close the facility and remove waste. At the department's request, various generators assumed responsibility for disposal of a portion of the waste remaining. Much of the remaining hazardous waste inventory was transported in bulk or in drums as appropriate to an approved off-site RCRA facility for treatment and/or disposal. Due to the liquidation of the insurance company that provided the financial assurance instrument to ensure proper closure, waste unclaimed by generators remained on site.

Continental Cement Company of Hannibal, Missouri, agreed to dispose of wastes that it can accept. Heritage Environmental Services completed the removal of those wastes and their transport to Continental Cement. Continental Cement was unable to accept the contents of AST K-11, because Continental does not accept certain waste codes. Waste sludge remained in the bottom of the other three tanks. Heritage did not remove the sludge because it could not be vacuumed.

The department's Enforcement Section exhausted its means of waste removal. Therefore, on December 18, 2002, it referred the AMERECO site to the Superfund Section's Site Assessment Unit (SAU) for investigation.

SAU initiated an integrated Preliminary Assessment/Site Inspection/Removal Assessment (PA/SI/RA) investigation of the site. The primary objectives of the PA/SI/RA investigation included obtaining data to identify and characterize containerized waste: locate and identify potential sources of contamination; attempt to delineate the extent of the hazardous substances present in surface or subsurface soil and surface water at the site; and assess the threat to public health and the environment. The two end dump trailers that remain in the RCRA 7 building have been re-sampled and characterized as part of a second phase of the investigation.

In December 2003, the department requested assistance from the U.S. Environmental Protection Agency (EPA) in removing flammable waste from the site. On February 18, 2004, the site caretaker notified the EPA that flammable liquid in an AST was leaking from corrosion holes into a containment area. On February 20 and 21, 2004, the EPA responded and pumped approximately 1,300 gallons of corrosive flammable tank bottoms and liquid from the leaking tank and transferred the materials to secure containers. The EPA initiated a full-scale removal action to remove and dispose of all on-site wastes.

On May 10, 2004 the EPA's Emergency and Rapid Response Service (ERSS) removed approximately 10,000 gallons of flammable liquid from the site. The flammable liquid contained oil with suspected PCB constituents and laboratory chemicals from various tanks and drums found in various containers on the site and in the facility's laboratory. Approximately 120 cubic yards of solid hazardous waste containing approximately 12 cubic yards of potential asbestos containing material was also removed from the site.

The department's Site Assessment Unit (SAU) conducted a Preliminary Assessment/ Site Inspection/ Removal Assessment (PA/SI/RA) pre-remedial investigation of the property in 2006.

In 2006, SAU conducted environmental sampling activities as part of the PA/SI/RA investigation of the property. Groundwater samples collected from nearby drinking water

wells were below all health based benchmarks. for VOCs, SVOCs, and metals. Surface and subsurface soil samples collected on the site were also below health based benchmarks for VOCs. SVOCs. PCBs. and metals. Surface water and sediment samples collected both on and off of the site did not show VOCs or SVOCs above health based benchmarks. Cadmium and lead were detected above some health based benchmarks in sediment collected from West Pin Oak Creek and a tributary to West Pin Oak Creek. The PA/SI/ RA concluded that based on the current site conditions and available information, the site did not warrant further CERCLA action. The department's RCRA section is currently working with the site owner to complete final closure.

General Geologic and Hydrologic Setting:

The site is located within the unglaciated Osage Plains section of the Central Lowlands physiographic province. Topographically, the site is situated amid rolling hills of an upland setting below Kestersen Lake and along the north shore of West Pin Oak Creek.

About 20 feet of residual silty clay soils cover Pennsylvanian-age bedrock of the Marmaton Group. The Marmaton Group is made up of shaley-limestone, sandstone and coal. Both the surficial material and underlying bedrock are considered to have a low hydraulic conductivity.

Shallow groundwater is present in the residual soils. However, yields and quality generally are low. The approximate location of the uppermost water table is at the contact between the fine-grained surficial materials and the shaley-limestone bedrock with a flow direction toward the northeast. Groundwater found in this unconfined water-bearing zone is not present in sufficient quantities for regular domestic use. Deeper wells drilled into upper Marmaton Group produce small amounts of mineralized potable water. Groundwater mineralization increases significantly with depth. As a result, no local water wells draw water from wells drilled deeper than 650 feet below ground surface.

Public Drinking Water Advisory:

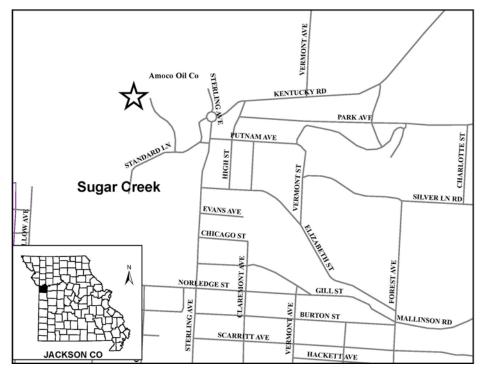
The city of Holden acquires its drinking water from a lake approximately 2 miles northwest of the AMERECO Site. The site is not within the drainage area of the lake. The western half of Johnson County is supplied by the Johnson Co. Public Water Supply District #2. However, the wells providing water to that system are located in the eastern half of the county far from the AMERECO Site. No effect on public water supplies is expected.

Health Assessment:

The uncertainty associated with the types. volume, and instability of containerized hazardous waste that was being stored at this facility makes it difficult to discuss possible health effects. Heavy metals such as arsenic, lead, cadmium, and mercury can cause a variety of health symptoms, including negative effects on every organ system. Eight metals along with 31 volatile organic compounds such as benzene, 2-butanone, chloroform, tetrachloroethylene, trichloroethylene, and 11 semi-volatile organic compounds, and polychlorinated biphenyls (PCBs) were present in on-site containers at concentrations exceeding the toxicity characteristic leaching procedure (TCLP) regulatory limits for these compounds. See Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Based on available information, a health threat exists at this site. Trespassers have been encountered on numerous occasions on this abandoned site. The possibility of human exposure exists due to marginally functional fencing, gates, and signs.

Amoco Oil-Sugar Creek Refinery



Site Name: Amoco Oil - Sugar Creek

Refinery

Classification: Class 3

Date of Registry Placement: June 14, 1984

Site Address: 1000 North Sterling, Sugar Creek, Jackson County, Missouri. Five areas contained in Sec. 28, W 1/2, Sec. 27, N 1/2, Sec. 33, R. 32W, T. 50N of the Independence Quadrangle and N 1/2, Sec. 28, R. 32W, T. 50N, NW 1/2 Sec. 27, R. 32W, T. 50N of the Liberty Quadrangle

<u>Present Property Owner</u>: BP Products North America, Inc.

Lead Agency: DNR (post closure and technical corrective action lead); EPA (administrative corrective action)

<u>Waste Type</u>: Lead and lead compounds, cadmium, polycyclic aromatic hydrocarbons (PAHs), oil and sludges, chromium, arsenic, mercury, benzene, toluene, ethyl benzene, MTBE, and xylene

Quantity: Not determined

Site Description:

This site is the location of a former active oil refinery. The Amoco Oil Refinery began operations in 1904 and ceased refinement of crude oil and production of petroleum products in 1982. The former refinery area consists of about 423 acres, Presently, the only active industrial operations at the site include a bulk storage and pipeline terminal for petroleum products, which is owned and operated by Buckeye Tank Terminals, LLC. The City of Sugar Creek Police and Fire Station are also located on a portion of the former refinery property. Remedial activities are also conducted at the site including oil recovery, operation, inspection, and maintenance of wastewater collection an conveyance systems, general grounds maintenance, and site security. now operates a pipeline and marketing terminal on a portion of the property. The site is fenced, locked and guarded.

Five separate disposal areas which total about 22 acres of the Amoco property are listed on the Registry. These areas are located next to the Missouri River. The registered areas include four inactive tank bottom disposal areas and one inactive sludge disposal area.

The U.S. Environmental Protection Agency (EPA) identified a land farm for the disposal of leaded gasoline storage sludge as having high concentrations of lead and chromium. The land farm is near the river.

Environmental Problems and Areas of Concern Related to Site:

The location next to the Missouri River presents problems because of flooding and groundwater contamination. The principal discharge areas for groundwater beneath the site are the Missouri River and Sugar Creek. Surface soil contamination is widespread but is contained within berms. During the flood of 1993, the inactive sludge disposal area was covered by floodwater.

Groundwater contamination has resulted from past activities at the site. Groundwater discharge to the Missouri River has had minor impacts to the water quality. The Missouri River is used as a drinking water supply downstream. The Missouri River alluvium supplies drinking water to a major municipality downstream.

The proposed Lewis and Clark Expressway, formerly called the South Riverfront Expressway, will connect from I-435 and Front Street, south of the Missouri River, and extending to Sterling Ave. The portion of the proposed expressway as it crosses Sugar Creek and connects with Sterling Avenue will be built on former Amoco Refinery property. The final design for the Sterling Avenue portion of the expressway is well underway. The department is continuing to work with stakeholders on this project to address any potential human health or environmental impacts associated with the planned expressway development.

Remedial Actions at Site:

Amoco Oil Company, now BP Products North America Inc., developed and submitted a revised closure plan for the Resource Conservation and Recovery Act (RCRA) interim status units at the facility. These units are not part of the property that is listed on the Registry. The Department of Natural Resources approved the closure plan for the surface impoundments in September 1987.

Amoco used a stockpile composting process, combined with land treatment of solids, to treat the oily wastes from the single waste management unit (SWMU). In 1999, Amoco completed bioremediation of the SWMU and began capping the treated soil. Capping and other closure activities were completed in August 1999.

The RCRA leaded tank bottom area was closed during April 1988. About 600 cubic yards of contaminated soil were removed and taken to the Peoria Disposal Landfill. This area is now well-vegetated.

Groundwater has been monitored since the 1970s. A RCRA quarterly monitoring program began in 1981. In addition, Amoco is conducting a liquid hydrocarbon monitoring and recovery program with recovery wells removing hydrocarbons from the groundwater. An interceptor trench, located along the northern property boundary, is also used to collect groundwater containing dissolved petroleum products.

Besides the Registry Units and the Single Waste Management Unit, the majority of the site has been dismantled and remedial actions are being addressed under RCRA Corrective Action. EPA issued Amoco a consent order on June 30, 1989. The EPA's consent order required Amoco to conduct a RCRA Facility Investigation (RFI) to investigate and characterize the entire site, conduct a Corrective Measures Study (CMS) to evaluate remedy alternatives, and select a final remedy for the entire site. The RFI was submitted in December 1995. Regulatory review of the RFI was completed in April 1998.

In 2000, the site was divided into sections and provide additional investigative detail through preparation of RFI's for the various parcels. DNR issued Amoco a Corrective Action Abatement Order on Consent on April 6, 2005. Once the final remedy for each section is approved under EPA's Order, DNR's Order covers the implementation of the final remedy for that section.

The final remedies for the off-site areas and two of the on-site areas of the site have been approved and are being implemented. The approved remedy for the off-site area includes

biosparging, enhanced bioremediation, phytoremediation, continued use of the interceptor trench, and monitored natural attenuation. The approved remedy for the two on-site areas include hydraulic control systems, continued use of the interceptor trench, passive skimming systems, vacuum truck recovery, monitored natural recovery of sediments in Sugar Creek, sediment removal, bank soil restoration, and institutional controls. Several on-site sections have received final RCRA Facility Investigation (RFI) approval. The CMS reports for the remaining on-site sections are being reviewed.

Numerous interim measures to remove contamination have been implemented throughout the site, including soil and product removal, multiphase extraction wells, horizontal extraction wells, interceptor trenches, vacuum truck recovery, passive skimming systems, and hydraulic control systems.

General Geologic and Hydrologic Setting:

The site is near the junction of Sugar Creek and the Missouri River. The former plant is located on an upland while the disposal facilities are located in the flood plain.

Pennsylvanian-age limestone and shale bedrock is present in the upland area south of the river. Most of this area is covered by varying thicknesses of silty clay loess and weathered loess. The disposal facilities for the plant are situated on fill and alluvial soil of the Missouri River flood plain.

The bedrock underlying surficial material is considered to be of low permeability. Movement of contaminants is therefore most likely to occur through highly permeable alluvium in the valley and, to a lesser extent, through the loess.

Potential contaminants from the uplands are expected to move downgradient to the north, emerging at the flood plain. Contamination from the flood plain may move through the shallow alluvial material directly to the Missouri River.

Public Drinking Water Advisory:

Alluvial groundwater in the immediate vicinity is potentially usable as a drinking water supply, but there is no current use nearer than the alluvial wells serving the city of Independence located 2.5 miles downstream. The nearest public water system surface water intake is at Lexington which is 31 miles downstream. The site may affect the water quality of the Missouri River but poses little direct threat to downstream public water systems.

Health Assessment:

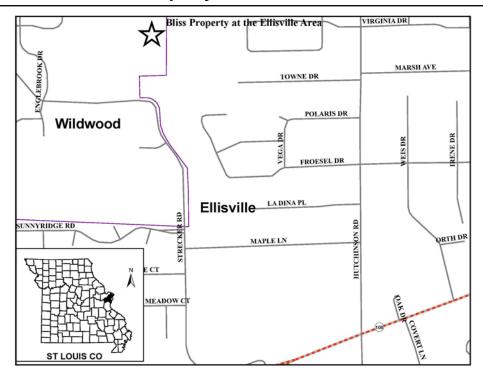
The Amoco Oil Company known formerly as Standard Oil Refinery-Sugar Creek operated a refinery from 1903 until 1982. The site now serves as a gasoline storage and distribution facility. Past monitoring of the groundwater in the area indicates that contamination has occurred. Concentrations of lead. chromium and phenol in groundwater were found to exceed Environmental Protection Agency (EPA) water quality standards. Additional information supplied also identified arsenic, mercury, benzene, toluene, and tetraethyl lead as being found in water samples. See Appendix A, Health Assessment Chemical Table for health effects associated with these chemicals.

Contaminated groundwater is the major pathway of concern at this site. The average slope is less than two percent, which makes surface runoff unlikely, except when the Missouri River floods the area. Because the facility is isolated and access is restricted, direct contact and inhalation are not considered to currently pose a public health threat. There is an offsite groundwater plume near the upland portion of the facility. However, this release is not believed to be associated with the Registry portion of the facility.

An exposure assessment conducted by the Missouri Department of Health and Senior Services uncovered no evidence of human exposure occurring off-site. The nearest public drinking water wells are approximately three miles downstream. The site could adversely affect water quality of both the Missouri River and the alluvial aquifer.

Based on available information, the site poses a potential health threat and should remain on the Registry. This determination is based on the toxicity of the chemicals present and the known groundwater contamination.

Bliss Property at the Ellisville Area



<u>Site Name</u>: Bliss Property – Ellisville (includes the former Simmons property)

Classification: Class 3

<u>Date of Registry Placement</u>: January 3, 1984

Date of NPL Listing: September 8, 1983

Site Address: 149 Strecker Road, Ellisville, St. Louis County, Missouri, Portions of SW 1/4, NW 1/4, Sec. 32, T. 45N, R. 4E, Manchester Quadrangle

<u>Present Property Owner</u>: Jerry Russell Bliss and Russell Bliss

Lead Agency: EPA

<u>Waste Type</u>: 2,3,7,8-TCDD (dioxin), waste pigments, solvents, oils, and pesticides

<u>Contaminants:</u> Di-n-butyl phthalate, bis (2-ethylhexyl) phthalate, naphthalene, isophorone, chloroform, ethyl benzene, tetrachloroethylene, toluene, benzene compounds, polychlorinated biphenyls, dioxin

Quantity: EPA estimates at least 1,500 drums; 7,000 cubic yards of dioxin

contaminated soils; and 10,000 cubic yards of non-dioxin hazardous waste materials and soils were once present at the site.

Site Description:

This property consists of about 16.5 acres in western St. Louis County located on the north side of Strecker Road. The Bliss property and parts of several contiguous properties were addressed as the entire "Bliss - Ellisville Site." The Bliss property is currently used as a personal residence, a rental residence, and a commercial horse boarding and arena operation. The site is located in an upland wooded area and is surrounded by numerous new housing developments with residences within 2,000 feet of formerly contaminated areas. A preschool and a home for the aged are located within 0.5 miles. Quail Woods Park is also located nearby.

During the 1960s and 1970s, Bliss Waste Oil Company operated this site. The business engaged in transportation, disposal and recycling of waste oil products, industrial wastes and chemicals.

Investigations identified soil contamination resulting from the disposal of dioxin-contaminated waste from the waste oil hauling

business. Other hazardous wastes, such as solvents, pesticides and oils, were disposed in bulk quantities at the site. The site was added to the U.S. Environmental Protection Agency's (EPA) NPL in 1983. In December 1998, Jerry Bliss purchased a 4.29 acre property owned by Martha Simmons that was also part of the Ellisville-Bliss Site and contiguous to Bliss' property.

Environmental Problems and Areas of Concern Related to Site:

Groundwater is contaminated with volatile organic compounds (VOCs) from previous site operations. Continued monitoring is needed to make sure it's not migrating off the Ellisville site. Sampling of the shallow groundwater as well as surface water has been completed and no VOCs were detected.

Remedial Actions at Site:

In June 1981, the Missouri Department of Natural Resources (the department) excavated exploratory trenches on the property to confirm the reported presence of hazardous material in drums and disposal pits. The department conducted a geophysical survey of the property in June 1982. A field RI, performed between December 1982 and February 1983, delineated the approximate boundaries of actual or suspected waste disposal locations.

In February 1986, a FS was completed, evaluating various cleanup alternatives. A public comment period followed. In April 1986, the department erected 400 feet of fence to prevent access to the site from the newly-developed Quail Woods Park. A ROD for the management of the non-dioxin contaminated soils was signed in September 1986. The ROD proposed excavation and offsite disposal as the preferred remedy for the buried drums and buried waste.

In December 1990, the Eastern District of the Federal District Court approved a Consent Decree signed by the EPA, Syntex Agribusiness Inc., the U.S. Justice Department, and the department for a mixedwork settlement that removed the dioxincontaminated material. Under the Consent Decree, contaminated material exceeding

health-based levels was excavated and transported to Times Beach for thermal treatment. The site was then restored.

Also during 1990, the EPA investigated this property and the contiguous properties and determined that 180,000 square feet were contaminated with dioxin. At the completion of the sampling, the site was surveyed and a six foot high, chain-link fence with three barbed wire strands on top was constructed around the perimeter to control access.

In July 1991, the EPA completed a FS evaluating several remedial alternatives for the final management of the dioxin-contaminated soils. The EPA's preferred remedy included excavation and transportation to Times Beach for thermal destruction. In July 1992, the EPA developed a plan to monitor groundwater at this site.

In November 1993, the EPA collected surface soil samples downgradient of the site within the Turnberry Place Subdivision. This sampling was performed to determine if recent flooding had caused any migration of dioxincontaminated materials off site. No dioxin was detected in any of these samples.

The site cleanup by the EPA took place between February 7 and August 26, 1996. The dioxin-contaminated materials were removed to a 1 part per billion (ppb) equivalent level. About 24,707 tons of dioxincontaminated waste was excavated and delivered to the Times Beach Thermal Treatment Facility. About 576 tons of dioxincontaminated soil, mixed with paint wastes (and 210 drums containing same), were excavated and delivered to the APTUS incinerator in Coffeyville, Kansas. Eighty-one drums of waste not contaminated with dioxin were sent to Environmental Services of America in Scott City. Forty-nine drums containing listed hazardous wastes D001, D005, D007, D008, D019, D035, and D040, as well as 169 tons of paint wastecontaminated soil, were delivered to Rollins Environmental Services in Deer Park, Texas. Also, 581 tons of paint waste-contaminated soil was delivered to Liquid Waste Disposal in Calvert City, Kentucky.

Groundwater monitoring wells were installed

by the EPA in the fall of 1997. Two wells were placed downgradient and one upgradient. These wells were installed to determine if any of the contaminants migrated into the local groundwater. The wells were sampled on a regular basis starting in 1998 up until 2006. A spring, located about 2.5 miles from the site, was also sampled to determine if any possible contamination migrated from the site.

In June 2006, EPA presented a summary report of all the groundwater data that had been collected at the site since 1998. Sampling indicates there is significant volatile organic compounds (VOCs) contamination of the groundwater and that the levels in the groundwater have been increasing over time. Groundwater samples at MW3 have contamination at levels of concern. Many of the contaminants are present at orders of magnitude above safe health limits. In September 2006 the state conducted a round of groundwater sampling at the site. The levels of contamination were consistent with the trends noted in the EPA data.

Residential development in the Ellisville/ Wildwood area escalated in 2006. In 2007, a developer bought the Primm property located west of the Bliss property. He had planned to build a new subdivision on the property. Local residents and activists opposed development on the property due to possible contaminants missed during EPA clean-up activities and migration of contamination from the Bliss property. The citizens' concerns led to a moratorium on construction on all properties associated with the Bliss site in the City of Wildwood. Due to the environmental issues surrounding the property, he entered the property into the Superfund Cooperative Program, hoping to relieve concerns over encounters with any potential residual or missed contamination that may be encountered during construction. Local residents and activists remained adamant in the opposition to future development. To satisfy the opposition, the City of Wildwood hired an outside consultant to investigate the Primm property.

On May 8, 2008, representatives of the department, along with staff from the Department of Health and Senior Services and EPA attended the Wildwood City Council

meeting. The meeting was held to allow the consultant, hired by the City of Wildwood, to present their findings and recommendations related to the Primm property. The conclusions reached by Wildwood's consultant, along with the concerns of local citizens and city council members, resulted in the council's approving further investigation of the Primm property. The work on the Primm property will likely be completed before the department can move forward with the proposed work on the Bliss property.

Sampling was conducted in September 2008, by the department. The purpose of the sampling was to investigate the overburden soils to look for source material that could be contributing to the groundwater contamination beneath the Bliss property and decide if further investigation or action is warranted. Samples were taken from soil, surface water, and shallow groundwater when encountered. All samples were analyzed for volatiles and semi volatiles organics, metals, and base neutral acids. Three samples were additionally analyzed for dioxins and furans. The investigation did not disclose any potential source areas that could account for the groundwater contamination.

In the summer of 2009, the project manager informed the Wildwood City Council that a MW-3 was showing elevated levels of VOCs. Due to the manner of waste disposal and the amounts of contaminants released during the operation of the Bliss Waste Oil facility, it is believed that the contaminants have saturated the bedrock matrix beneath the site and that the contaminated matrix continues to act as a source for groundwater contamination. The Department of Health reviewed the sampling data and had concerns over harmful vapors that could intrude into nearby homes.

In Nov of 2009 the department installed additional wells as part of a subsurface investigation on the site and conducted soil boring to test for vapor intrusion. Sampling events are being conducted quarterly for the next two years.

The preliminary results of the investigation indicate there are no conditions present that cause a risk to human health. The investigation of groundwater contamination

continues. No conclusions have been reached. Data collection will continue.

General Geologic and Hydrologic Setting:

The site is located in an upland, wooded area with steep hillslopes descending to a low-lying, intermittent tributary of Caulks Creek. The upland soils are composed of silty clay loess overlying cherty residuum derived from the weathering of bedrock. The loess is up to 10 feet thick and has moderate to low permeability. The residuum is moderately to highly permeable. Soil material along the valley, near the horse arena, is composed of gray, silty clay and clayey silt.

Bedrock at the site consists of the Mississippian-age Burlington Limestone Formation. This formation contains solution-enlarged openings which provide avenues of rapid fluid transport to groundwater.

Under normal flow conditions, the surface drainage upstream of the former dump site area is gaining; that is, water flowing on the surface tends to remain on the surface. This is due to the presence of the relatively lowpermeability loess soil which underlies that portion of the property. However, in the vicinity of the former dump site where the loess is absent, surface water is lost to the subsurface via the relatively high-permeability cherty residuum and weathered bedrock present beneath that portion of the site. Water tracing studies conducted in 1992, and 1997, indicate that water flowing into the subsurface in the vicinity of the former dump site is discharged at Lewis Spring, which is located along Caulks Creek downstream of the site. During high surface flow conditions, such as that immediately following heavy precipitation events, some flow remains in the surface stream throughout its extent on site and further downstream.

Due to the presence of losing stream conditions immediately downgradient of the former dump site, groundwater quality may be adversely impacted. Private wells open to the shallow aquifer could possibly be affected. However, subsurface flow from the losing stream segment probably is channelized sufficiently to prevent widespread contamination of groundwater.

Public Drinking Water Advisory:

The nearest public well is 2 miles southwest of the site. No public wells are currently affected by this site. However, the local groundwater is potable and new wells are commonly being constructed in this area to support local development.

Health Assessment:

The dioxin-contaminated soil, the buried drums, and associated soil contamination have all been removed from the site. The site remains fenced and has warning signs posted. However, groundwater is contaminated with VOCs; therefore, the route of potential exposure that remains is through groundwater.

To determine if contaminants have migrated from the site, EPA and DNR continue to investigate and monitor the groundwater. The Missouri Department of Health and Senior Services (DHSS) has sampled private wells down gradient from the site since 1984. To date, DHSS has not found any private wells contaminated with site-related volatile organic compounds. Although no direct exposure to the contaminated groundwater has been identified, there is a potential for vapor intrusion to occur.

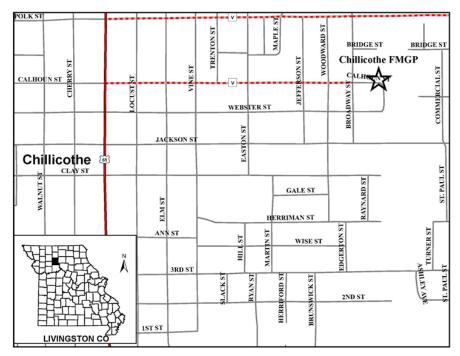
In 2009, DHSS screened on-site groundwater data for potential vapor intrusion risk. Some of the VOCs detected on site were above the screening criteria; therefore, DHSS recommended further site characterization to evaluate the vapor intrusion pathway. DHSS specifically recommended sampling near the property boundary to evaluate potential offsite risk for vapor intrusion.

The department has conducted several rounds of soil gas sampling near the property boundary in the past few years. Preliminary evaluation of this data does not show any VOCs in soil gas above screening levels; however, additional investigation may be warranted to fully evaluate the vapor intrusion pathway.

To address concerns regarding the proposed development of the Primm property, located west of the Bliss property, the City of Wildwood commissioned a Phase II

Environmental Site Assessment (ESA) for the Strecker Forest Development Site. The City subsequently commissioned a Human Health Risk Assessment (HHRA), largely based on the ESA report. The U.S. EPA then conducted an Expanded Site Review (ESR) for the Strecker Forest Development site. The purpose of the ESR was to build upon previous studies to establish a data set that would support a more comprehensive assessment of human health risks for short term trespassers and for proposed residential land use at Strecker Forest and to characterize the potential for impacts to existing properties/residents in nearby areas.

The ESR report dated June 13, 2011, recommended that conditions throughout the portion of the Strecker Forest parcel proposed for housing construction are generally considered protective for residential development and use. Further assessment of this portion of the parcel would be limited to additional characterization of the isolated dioxin TEQ level identified in DU 19 to provide information regarding a possible source and help determine the need for mitigation prior to development. The reports also called for further assessment of potential risks at the Strecker Forest property, focusing on conditions in the northeast portion of the parcel, and evaluate potential risks from complete exposure pathways based on current and potential future land use. Following these recommendations, the EPA in their Memorandum on Preliminary Remediation Goals (PRGs) for Dioxin in Surface Soil for the Proposed Strecker Forest Development dated July 29,2013 derived a site-specific Preliminary Remediation Goal (PRG) of 820 parts per trillion (ppt) as protective of a youth trespasser, based on cancer and non-cancer health effects. DHSS understands this PRG to be site-specific and with the presumption that land use controls will be established restricting future development and/or residential use for this portion of the site, and that that the PRG is specific to a recreational or trespasser setting. Other scenarios or settings would need to be considered on their own merit. EPA is currently in the process of soil removal to meet the PRG for that portion of the property.



Site Name: Chillicothe FMGP

Classification: Class 3

Date of Registry Placement: April 8, 2000

Site Address: Between Calhoun and Bridge Streets, Chillicothe, Livingston County, Missouri, NW ¼, NW ¼, SE ¼, Sec. 36, T. 58N, R. 24W.

<u>Present Property Owner</u>: Empire District Gas Co.

Lead Agency: DNR

<u>Waste Type</u>: Coal tar, which contains volatile organic compounds (VOCs) and semi-volatile organic compounds, including polycyclic aromatic hydrocarbons (PAHs)

Quantity: Not determined

Site Description:

The Chillicothe Former Manufactured Gas Plant (FMGP) Site is 0.63 acres in size and located in an industrial area next to residential areas within the city of Chillicothe. A manufactured gas plant operated at the site from 1892 until 1939. Remnants of foundations from former gas plant structures

are present. Some structures from the past gas manufacturing facility might still be partially intact beneath the site. A chain-link fence topped with barbed wire has been installed around the site. The site is currently used as a service center for natural gas distribution in the Chillicothe area. It contains a metal warehouse used as an office and for storage of parts and equipment. The rest of the site is mostly a storage yard. The surface of the storage yard has been paved using cast -in-place concrete.

The plant first produced oil gas then changed to water gas in 1913. After the plant stopped manufacturing gas, liquefied petroleum gas was stored at the site for distribution to the city. Estimated total production during the plant's 47 years of operation is 324,000,000 cubic feet of gas and 270,000 gallons of coal tar. Coal tar, a byproduct of the gas manufacturing process, is the primary waste of concern.

Environmental Problems and Areas of Concern Related to the Site:

Carcinogenic PAHs are present at concentrations above health-based screening levels in the surface soil and in one residential yards adjacent to the site. Coal tar containing

PAHs and VOCs has been detected at concentrations above regulatory limits in the subsurface on site. Specifically, benzene was present at a concentration above the Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit of 0.5 parts per million (ppm). One sample had a TCLP result of 7.8 ppm.

Water collected from the water supply line to the on-site warehouse contained levels of ethylbenzene and xylene below Maximum Containment Limits (MCLs). The source of this contamination has not been determined.

Remedial Actions at Site:

Around 1940, all manufactured gas equipment was removed from the site. In 1983, approximately 28,000 gallons of ignitable coal tar gas waste was removed from the site and transported to an incinerator.

The Department of Natural Resources completed an Integrated Site Inspection/ Removal Site Evaluation (SI/RSE) on March 26, 1999. The SI/RSE concluded that the surface soil contamination is not a concern at this time. The coal tar remaining in the subsurface currently does not pose an exposure risk. However, it will continue to be a threat should excavation occur in the future. Two volatile organic compounds were detected below MCLs in the drinking water at the time of this investigation. The SI/RSE recommended that the site owners conduct supplemental sampling to confirm the presence of these contaminants and investigate their possible source.

In 2007, as part of a service building expansion, 168 tons of soil and 2,200 gallons of groundwater were removed from the site and the site was encapsulated with a concrete cap. Additional samples were taken of the drinking water during this building expansion project. No VOCs were detected.

General Geologic and Hydrologic Setting:

The Chillicothe FMGP Site is located in the Dissected Till Plains region of the Central Lowlands Physiographic Province. The area is blanketed by a layer of low-permeability glacial till, consisting of a poorly sorted mixture of clay to boulder-sized particles. A

thin mantle of windblown loess covers the till. The thickness of unconsolidated deposits ranges from 0 to 180 feet in the area.

Pennsylvanian-aged bedrock, consisting of shale, limestone and sandstone, underlies the unconsolidated material.

An east-west trending preglacial channel located just south of Chillicothe is the primary source of drinking water in the area. Minor amounts of poor quality groundwater can be found in glaciofluvial sand and gravel lenses in the till. Yields from wells outside the preglacial channel are usually low. Preglacial channel wells can have substantial yields. Water from the consolidated bedrock is mineralized; which increases with depth. It appears that in the early part of the century, the bedrock was commonly used as a source of groundwater, but all recent wells draw water from the unconsolidated sediments.

Public Drinking Water Advisory:

The Chillicothe FMGP is located within two to three miles of four wells serving the city of Chillicothe and two wells serving Livingston County Public Water Supply District #2. Groundwater contaminants are a concern but have not been shown to be moving toward the wells or been detected in the drinking water.

Health Assessment:

The following are the major contaminants of concern found in soil at the site: benzene, ethylbenzene, cadmium, toluene, xylene, and PAH's. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Preliminary soil investigations have been performed for both on- and off-site soils. Previous on-site soil sample results indicate that subsurface soil contamination may be extensive within the site boundaries. Because subsoil is not readily accessible without being disturbed, risk associated with this site to nearby residents and persons accessing the site appears to be limited to volatile chemical emissions to outdoor air and vapor intrusion into indoor air, and migration of contamination in groundwater. However, if the site is

disturbed, on-site exposure to harmful levels of contaminants within subsurface soils may then be either taken in through ingestion or dermal contact with contaminated soil, and inhalation of dust and vapors. Disturbance of the soil may also cause off-site contamination through erosion caused by wind and water, and increased vapor emissions resulting from rapid volatilization of contaminants.

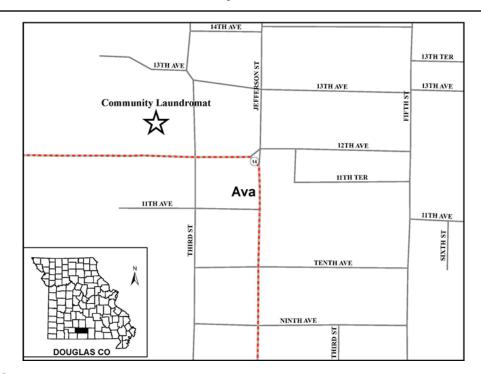
Site-related contamination has been detected in surface soils sample results of residential lots adjacent to the site. However, a comparison of the sample results to residential, risk-based soil screening values indicates no significant health risk exists for residents exposed to the sampled soils.

The Department of Health and Senior Services (DHSS) is concerned that vapor intrusion may be occurring into the occupied building at this service center. Empire District Electric Company recently erected an addition to the existing building, and then paved the site. Erection of the additional building began in May 2007. During a Department of Natural Resources (DNR) visit during at this time, digging for the footings had begun. DNR personnel noted an unidentified odor emitting from the site, indicating the potential for shallow soil contamination and/or soil gas emissions of contamination. Sampling of shallow soils and groundwater resulted in detection of benzene at concentrations that potentially pose a risk to human health for vapor intrusion into the building addition.

The soils effects on groundwater are not known, but contamination may be affecting the public water supply. Low levels of xylene and ethylbenzene have been found in water samples taken from an on-site sampling point connected to the public water supply. If the contaminated soil is affecting this water line, other persons served by this section of the public water supply and any persons on the site ingesting this water may be adversely affected. The source of contaminants infiltrating this water supply line should be investigated.

No conclusive evidence has been provided to determine whether off-site migration of contaminated groundwater or soil gas is occurring. Off-site migration of volatile chemicals may cause vapor intrusion into residential buildings on adjacent properties. The site represents a potential health threat, especially if the site is disturbed. Currently, workers occupying the addition may be at risk due to vapor intrusion into the building. Residents off site may also be at risk due to the limited characterization of contamination. DHSS will continue to request further characterization of on-site and off site soil and groundwater contamination, monitoring of the public drinking water supply at the facility, and an assessment of the potential for vapor intrusion both on site and off-site.

Community Laundromat



<u>Site Name</u>: Community Laundromat

Classification: Class 3

Date of Registry Placement: March 21, 2003

Site Address: 306 NW 12th Avenue, Ava,

Missouri

Present Property Owner: John Sutton

Lead Agency: EPA

Waste Type: Tetrachloroethylene (PCE) and

trichloroethylene (TCE)

Quantity: Not determined

Site Description:

The site consists of the Community Laundromat facility and a groundwater plume beneath the property. The plume is contaminated with tetrachloroethylene (PCE) and extends at least 0.5 mile to the southwest. The Community Laundromat facility is 1,500 square feet in size and was a private home that was converted into a business. Access is unrestricted. From 1987 to 1995, dry cleaning operations using PCE were conducted at the site, but the laundromat is now closed.

Environmental Problems and Areas of Concern Related to Site:

The primary contaminants of concern associated with the site include PCE and its natural degradation products TCE, vinyl chloride, and cis-1,2-DCE. To date, only PCE and TCE have been detected on site, although cis-1,2-DCE has been detected in a downgradient spring.

PCE is listed as U.S. Environmental Protection Agency (EPA) hazardous waste F002. PCE concentrations in the groundwater ranged from 0.0498 parts per million (ppm) to 21.4 ppm, exceeding the CALM Groundwater Target Concentration (GTARC) of 0.005 ppm.

In addition, PCE was present in groundwater at concentrations above the Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit of 0.7 ppm. Three samples showed TCLP concentrations of 21.4 ppm, 7.23 ppm, and 7.08 ppm, which define these samples as characteristic hazardous waste based on toxicity.

In 2001, PCE was detected at a level of 0.0351 ppm at a downgradient spring. Another sample taken at the Old Spring House in January 2002, had levels of PCE of 0.0373 ppm.

TCE is listed as EPA hazardous waste F002, and the levels found in groundwater, 0.0076 ppm and 0.0065 ppm, exceed the CALM GTARC of 0.005 ppm TCE.

As a result of groundwater to surface water discharge, contamination from the Community Laundromat Site has entered the unnamed tributary of Prairie Creek that runs through the town of Ava. PCE has been detected in two groundwater discharge areas, or springs, that feed into the Prairie Creek tributary and are located less than 0.25 mile from the site.

Remedial Action at the Site:

The Community Laundromat Site was identified as a potential contaminant source associated with the 12th Avenue Solvents Site. In November 2001, a Pre-Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Site Screening, completed by Tetra Tech EM Inc., an EPA contractor, documented PCE in the soil and shallow groundwater.

Tetra Tech EM completed a Preliminary Assessment (PA) in December 2001. No additional sampling was conducted. The PA concluded that the most likely source of PCE contamination identified on site and in the downgradient wetland discharge area is from the Community Laundromat facility. The PA recommended a Removal Assessment (RA).

The department initiated a RA investigation in December 2001. Sampling detected PCE in nine soil samples at depths ranging from 9 to 19 feet. The two highest concentrations from samples were located near the two spill incidents. The RA, completed in April 2002, recommended a removal action.

John Sutton, the current owner, submitted a change of use request to the department on September 11, 2003, to demolish the building on site. Mr. Sutton met with Eric Nold, the EPA OSC, and agreed to several guidelines for demolishing the building. The department approved the demolition; based on the owner meeting these guidelines. The demolition of the physical structure of the building is complete, however, the demolition debris (rubble) has not been removed from the site due to the discovery of potentially friable

asbestos. The department's asbestos management program coordinated the completion of the removal of the asbestos demolition debris with the owner of the property.

The site owner was made aware of the availability of the Drycleaning Environmental Response Trust (DERT) Fund Cleanup Assistance as a source of both guidance and funding for cleanup of chlorinated hydrocarbons from dry cleaning businesses. The DERT Fund has a deductible phase in that the first \$25,000 of expenditures after acceptance are not reimbursed.

Both Eric Nold of EPA and the department's Superfund Section encouraged the owner to apply for the voluntary DERT Fund Program. In December 2009, Community Laundromat and Drycleaner submitted an application for participation in the DERT Fund. The site was accepted on January 12, 2010.

Part of the DERT Fund process is to assign a Priority Ranking based on a score sheet the applicant's engineering consultant fills out. Community Laundromat received a "High" ranking which enhances its potential reimbursement schedule.

In April 2010, EPA Region 7 issued a letter to transfer lead agency oversight status to the DERT Fund. This transfer is not permanent if no progress is made in the DERT Fund. As of the end of 2010, no further contact was initiated by the site consultant or owner.

The DERT Fund requested further actions in December 2010, including submittal of a groundwater monitoring work plan, assessment of the condition of the monitoring wells on the site and possible additional well installation. In February 2011, RCE Pro, LLC, the consultant for the site, responded with information that the existing temporary wells built in 2002, are too damaged to be of further use. Work plans for site investigation were promised within 60 days but none have been submitted as of August 17, 2011. The site was terminated from the DERT Fund in September 2011, for lack of progress and referred immediately back to EPA to address.

EPA conducted a financial reassessment of

the owner's ability to pay any part of the planned removal action in 2012. It has been determined that it will be a fund-lead removal action. EPA plans to start removal assessment activities sometime during the Federal Fiscal year that runs from Oct 2013 to Sept 2014. Soil and groundwater will be assessed along with vapor intrusion which was not previously assessed.

Since the 2012 annual Registry site inspection, the building that previously housed the auction realty business is now being used by the Douglas County License Bureau.

General Geologic and Hydrologic Setting:

The site is located in the Salem Plateau section of the Ozark Plateaus physiographic province.

Soils are composed of gravelly clays and sandy loams developed from Ordovician-age Jefferson City Dolomite. Soil thickness varies from 8 to 20 feet from north to south across the site. The Jefferson City Dolomite, about 180 feet thick, is composed of interbedded dolomite, sandstone and shale, with less than 5 percent chert. Some karst features were observed in the area and in the subsurface near this site.

Depth to groundwater is 10 to 15 feet. Shallow groundwater flow is likely to the west, following surface topography. Surface water discharges to a drainage ditch along 12th Avenue and overland to an unnamed tributary to Prairie Creek. Municipal drinking water for the city of Ava is obtained from public water supply wells open to the Ozark Aquifer, of which the Jefferson City Dolomite is a part.

Public Drinking Water Advisory:

The site is within the wellhead protection area for the city of Ava. Ava's four wells are tested

quarterly and show no signs of contamination. Starting in 2010 testing will be backed off to annual. The Community Laundromat is considered to be a potential source of contamination.

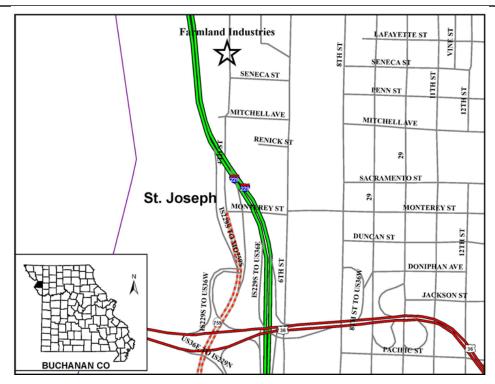
Health Assessment:

The central nervous system (CNS), including effects on the developing CNS, liver and kidneys are the targets of greatest concern from exposure to PCE and TCE. CNS effects may manifest as dizziness, headaches, sleepiness, confusion, nausea, difficulty in speaking and walking. Both PCE and TCE are possible carcinogens.

Inhalation, direct contact, and ingestion of contaminated surface water are potential routes of exposure at this site. Two springs that feed into the Prairie Creek tributary are used occasionally by children and adults for recreational purposes. These springs have had PCE detections. A water treatment system adjacent to the stream tributary reduces the risk of exposure to PCE-contaminated stream water.

The building that housed this business has been demolished, and is awaiting final clean up. This site is unrestricted, and poses a threat to the general public, and trespassers. Based on available information, a health threat exists at this site. The location of Ava's public wells within a four-mile radius of the site poses a potential risk to the public.

Farmland Industries



Site Name: Farmland Industries

Classification: Class 3

Date of Registry Placement: March 30, 1988

Site Address: 4th and Seneca Streets, St. Joseph, Missouri, NW 1/4, Sec. 17, T.57N, R.35W, Buchanan County, St. Joseph North Quadrangle

Present Property Owner: Burlington

Northern Santa Fe Railroad

Lead Agency: EPA

Waste Type: Pesticides, polycyclic aromatic hydrocarbons (PAHs), heavy metals, and volatile organic compounds (VOCs)

Quantity: Not determined

Site Description:

The Farmland Industries Site is the location of a former pesticide formulation plant. This site is approximately 2.6 acres in size and is located on the eastern bank of the Missouri River in a moderately industrialized area of the flood plain. Numerous manufacturing and

warehouse facilities are located adjacent to the property. This subject site is owned by the Burlington Northern Santa Fe Railroad (BNSF) and the land was leased to several different companies throughout history. Between 1950 and 1980, several companies occupied the site while formulating organochlorine pesticides. The Woodbury Chemical Company first leased the property from 1950 to 1969. Farmland Industries first acquired stock in the company in 1966. By 1970, Farmland Industries and Dow Chemical each owned 50 percent of the company stock, and the company name was changed to Missouri Chemical Company. Farmland Industries purchased Dow's stock in 1974. In 1979, Farmland began liquidating assets and fully closed the pesticide formulation operation in 1980. Buildings and associated facilities were removed in late 1979 and early 1980. In 1989, the site was clay capped and vegetated. A six-foot high, chain-link security fence encompasses the entire site, and warning signs are posted.

Environmental Problems and Areas of Concern Related to Site:

Surface soil samples collected by EPA in early 1980 detected significant concentrations of

pesticides and heavy metals. Soil samples collected in 1985, showed concentrations of chlordane, heptachlor, aldrin and dieldrin. Some results were in the parts per thousand range. Samples from one area contained greater than one percent chlordane. In addition to contaminated surface soils. subsurface soils and groundwater were contaminated. Aldrin was detected at 1,100 ppm at 15 to 16.5 feet in depth. Contaminants detected in the groundwater are consistent with those found in the subsurface soils. One water sample contained 11,000 ppm pesticides at 22 feet in depth. Although the contaminant plume is localized, the site is located in an area that has the potential to affect a major alluvial aquifer. Over the past several years, the Missouri Department of Health and Senior Services (DHSS) has been increasingly concerned with the possibility that the area outside the capped and fenced area is contaminated and the extent of the contamination has not been defined around the site.

Remedial Actions at Site:

On November 2, 1989, the EPA entered into an Administrative Order on Consent (AOC) with Farmland Industries Inc., Missouri Pacific Railroad Company, and Burlington Northern Railroad Company to implement the proposed capping plan and to reimburse the EPA for oversight costs.

The capping plan was implemented in November and December 1989. All quadrants of the site that contained a total pesticide concentration of 50 parts per million (ppm) or greater were capped with 18 inches of clean clay soils. Contaminated areas immediately outside the existing fence that exceeded the capping standard were removed for placement under the cap. The soils were resampled to verify that the residual pesticide levels were below the 50 ppm action level. The facility fencing was maintained as the primary means of access control. Abovegrade structures that hindered placement of the cap were removed. In April 1990, the site was prepared and seeded. A good vegetative cover is established on the cap. Groundwater was never fully characterized or addressed during the cleanup, despite concerns expressed by the department.

Following the bankruptcy of Farmland Industries, Inc., a settlement agreement was reached between the liquidating trustee, BNSF Railway Company, and the department. Pursuant to the settlement agreement, BNSF has taken over site maintenance and reporting obligations. These reports summarize all activities performed for the operation and maintenance of the cap during the preceding 12 months.

In August 2007, the department implemented a Site Reassessment (SR) for Farmland Industries. A SR sampling event was completed in October 2008. The purpose of the SR was to determine whether pesticide contamination was present in soil outside the capped and fenced area on the subject site. The SR sampling event involved collecting subsurface soil, surface soil and groundwater samples from the perimeter of the Farmland Industries capped and fenced site as well as the properties adjacent to the site. The soil and water samples were analyzed for beryllium, semi-volatile organic compounds and organochlorine pesticides. Some contamination was found in the adjacent properties.

In 2009, the department requested DHSS prepare a Health Consultation for the properties surrounding the Farmland Industries Site. The September 23, 2011 Health Consultation concluded that the amount of exposure to the chemicals at Farmland Industries is not expected to harm people's health. This decision was based on several facts that the chemicals present in the surface soils are below levels of health concern for non-cancer health effects.

Based on current site conditions and available information, the Farmland Industries Site warrants no further action at this time provided the subsequent DHSS recommendations are followed.

1. Maintenance of the clay cap, grass cover, and fencing (with warning signs) on the Farmland Industries Site should continue indefinitely to prevent contaminants from leaving the site and to prevent trespass on the site.

- 2. On areas outside of the Farmland Industries Site, simple steps should be taken to limit direct contact with the soil or dust when doing activities outside around the adjacent building and vacant areas. Maintaining a good grass cover would be one approach to avoiding direct contact.
- 3. Basic precautions such as personal protective equipment should be used if digging in the soil around the north end of the Butts Company property (property located south of the Farmland Industries Site) or near the Farmland property.
- 4. If any expansion is made to the Butts Company building or if the building is torn down, a reassessment of the site needs to be completed, including soil, water, and air sampling because additional exposure could take place.
- 5. Long-term stewardship mechanisms should be employed to ensure that the existing land use of the site not be changed to allow for greater human contact to site contaminants (such as allowing residential use) without further assessment and possibly remedial actions.

General Geologic and Hydrologic Setting:

Overburden at this location is composed of fill material over thick alluvial deposits, which are estimated to be 60 to 100 feet thick. The alluvium is composed of sand, silt and clay; with the coarser-grained material predominant at depth. Clay-rich material is present beneath the eastern portion of the site. The uppermost aquifer at this location is the Missouri River alluvium. Depth to groundwater, as indicated by monitoring wells, is 10 to 25 feet. Off-site migration of contaminants in groundwater most likely is toward the Missouri River; however, the potential does exist for high-yield wells to alter flow direction in the alluvial aquifer.

Because the bedrock here typically displays low permeability, contaminants are not anticipated to affect groundwater in the bedrock.

Public Drinking Water Advisory:

The site is downstream from St. Joseph's former drinking water river intake and the new drinking water well field. No other sources of public drinking water are in this area, and none should be affected by this site.

Health Assessment:

The following are the major contaminants of concern: aldrin, chlordane, DDT/DDD/DDE, dieldrin, endrin, hexachlorobenzene, heptachlor, polycyclic aromatic hydrocarbons (PAHs), and beryllium. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Inhalation, direct contact, and ingestion of contaminated ground and surface water are potential routes of exposure at this site. Exposure may result through the inhalation of contaminated soil particles. The site was remediated, capped, and a fence installed to prevent access after high levels of pesticide contamination was found. The most highly contaminated areas have therefore been capped to reduce the potential for exposure and to reduce migration of wastes via groundwater.

The site is located in the Missouri River alluvium and is within two hundred feet of the river. This combined with the concentration of pesticides at 22 feet below the surface, are indications that both surface and groundwater are probably being contaminated. Finally, since the chlorinated insecticides at this site are fat soluble, they tend to accumulate in the food chain. Human exposure is possible through the consumption of contaminated fish, due to the extremely high levels of organochlorines and the proximity of the site to the Missouri River. No recent exposures however have been documented at this site.

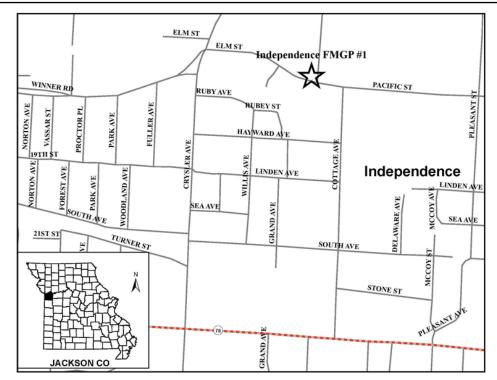
In October 2008, staff from the department conducted reassessment sampling of soil and groundwater on areas surrounding the Farmland Industries site. Low levels of pesticides and PAHs were found. The department

subsequently requested DHSS to do a health consultation to determine if a health concern exists at the properties surrounding the former Farmland industries property.

The health consultation found all chemicals present in the surface soils surrounding this industrial site to be below levels of health concern for non-cancer health effects. Based on the maximum levels that the department detected in surface soils, several PAHs and pesticides were above the EPA cancer risk screening level for industrial soils. However, the maximum levels of pesticides are primarily based on one sample while the elevated PAH levels appear to be prevalent throughout this industrial area. Contaminant levels in other adjacent properties were generally not above screening levels. DHSS concluded that the amount of exposure to chemicals in the area surrounding the Farmland site is not expected to harm people's health as long as the clay cap, grass cover, and site fencing is maintained. Outside the site, maintenance of a grass cover would limit direct contact with soil. The nearest residences are approximately 0.5 miles away.

Based on available information, a health threat exists on-site due to the residual contamination under the cap. The low levels of contaminant found in the surrounding areas do not present a significant health risk. These areas should ideally be kept under a grass cover.

Independence FMGP #1



Site Name: Independence FMGP #1

Classification: Class 3

Date of Registry Placement: November 28,

2000

<u>Site Address:</u> Northwest of the intersection of West Pacific Avenue and South River Boulevard, Independence, Jackson County, Missouri

<u>Present Property Owner</u>: Reorganized Church of Jesus Christ of Latter Day Saints (RLDS)

Lead Agency: DNR

<u>Waste Type</u>: Coal tar, which contains volatile organic compounds (VOCs) and semi-volatile organic compounds, including polycyclic aromatic hydrocarbons (PAHs)

Quantity: Not determined

Site Description:

The Independence Former Manufactured Gas Plant (FMGP) #1 Site is located in a combination residential, commercial and light

industrial area. A comparison of historic Sanborn Fire Insurance maps to present day conditions indicates that the gas plant operations occurred on property currently owned by RLDS. In addition, several of the plant operations buildings were located beneath what is now West Pacific Avenue. The site is located within the drainage basin along the southeast edge of the RLDS Auditorium parking area and extends beneath West Pacific Avenue. Currently, the entire basin area is covered by healthy vegetation, and access is not restricted. Visual remains of former gas plant structures are absent.

FMGP structures associated with the Coal Gas Works (later called the Jackson County Light, Heat, and Power Co. Gas Works) appear on historic Sanborn maps as early as 1885 and as late as 1898. The structures depicted included three gas holders, retort houses and purifiers. No information is available regarding operations after the closing of the manufactured gas plant circa 1926 and prior to the construction of the drainage basin in the early 1990's by RLDS.

Environmental Problems and Areas of Concern Related to Site:

Subsurface soil samples collected from the approximate location of the FMGP contained VOCs and carcinogenic PAHs at concentrations exceeding health-based screening levels. One sample contained leachable benzene that exceeded the Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit of 0.5 parts per million making this sample characteristic hazardous waste based on toxicity. The coal tar remaining in the subsurface may pose human health risks should any excavation or accidental uncovering occur in the future.

Remedial Action at the Site:

The department 's Hazardous Waste Program completed a pre-Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Site Screening (SS) report in May 2000. Coal tar, a byproduct of the gas manufacturing process, is the primary waste of concern on site.

The SS report concluded that the majority of contamination is located six to seven feet below ground surface and is not expected to pose a significant air or soil exposure risk. No residents or workers are on site. Although access is not restricted, visitation to the site is unlikely because of a large drainage basin and paved street that now occupy the former gas plant operations properties. Although hazardous substances are present, the potential for exposure and migration off site is minimal. Further Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) action was not recommended at the time of the site screening provided that institutional controls are in place and state oversight of future activities at the site is ensured.

General Geologic and Hydrologic Setting:

The site is located on the rolling, loess-covered hills immediately south of the Missouri River in the Kansas City region. It lies outside of a 50-year flood plain. Loess-derived surface soils at the site are composed of silt loam to silty-clay with a moderate permeability. Roughly 5 to 24 feet of loess

and glacial till overlie the local bedrock. Kansas City Group Pennsylvanian-age bedrock at the site consists of 450 feet of 1 to 20-foot thick beds of alternating limestone and shale with infrequent thin coal beds. Surface water infiltrates the shallow limestone layers which, in turn, form small intermittent springs on the hills.

Deep groundwater in the Kansas City region rarely is used for drinking purposes due to high mineral content. In close proximity to the site, groundwater is encountered at depths of 24 to 55 feet below the surface.

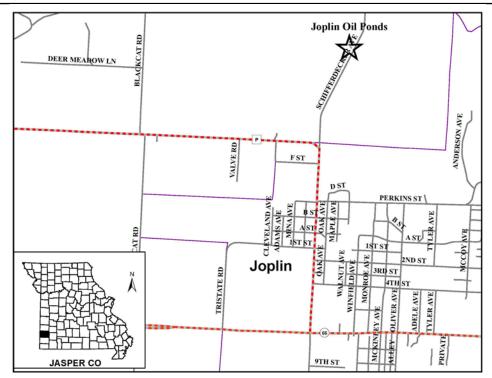
Public Drinking Water Advisory:

The city of Independence's wells are located in the Missouri River alluvium 5 miles northeast of the site. No other public water sources are in the area, and none are expected to be affected by this site.

Health Assessment:

Subsurface soil samples collected from the approximate location of the FMGP contained VOCs and PAHs at concentrations exceeding health-based screening levels. Some PAHs are suspected human carcinogens. Benzene is a known human and animal carcinogen and a suspected teratogen.

According to the department's SS report of May 2000, most of the contamination is confined at six to seven feet below the ground and is not expected to pose a significant air or soil exposure risk. Furthermore, no residents or workers are located on the site and the potential for exposure and migration off site is minimal. Therefore, no significant risk exists unless the subsurface soils are disturbed. Disturbance of the soil, other than regular lawn care and parking lot maintenance, would increase the chance for public exposure to the buried hazardous wastes.



Site Name: Joplin Oil Ponds

Classification: Class 3

Date of Registry Placement: June 14, 1984

<u>Site Address:</u> Joplin, Jasper County, Missouri, SW 1/4, NW 1/4, Sec. 33, T. 28N, R. 33W, Joplin West Quadrangle

Present Property Owner: City of Joplin

Lead Agency: DNR

Waste Type: Lead

Quantity: Unknown quantity of residual lead

contamination remains on site.

Site Description:

The site consists of two lagoons where septic tank haulers dumped wastes containing barium, chromium, lead, dichloroethane, trichloroethane, p-chloro-m-cresol, pentachlorophenol, and semi-volatile organic compounds. The 30-year-old lagoons once were filled with sludge and water but now are almost completely cleaned out.

Environmental Problems and Areas of Concern Related to Site:

Public and private water supply wells in the immediate area may be affected due to the geology of the area.

Remedial Actions at Site:

In June 1987, Joplin prepared a remedial action plan based on comprehensive sampling of water, sludge and soil on and near the site. The Missouri Department of Natural Resources (the department) approved the modified plan.

Beginning in November 1988, the pond water was treated and discharged to the city's wastewater treatment plant. The sludge, which was stabilized with fly ash and mixed to partly dry it, was taken to the Peoria Disposal Services Inc. facility in Peoria, Illinois.

Removal of contaminated soil from the lagoons' bottoms and sides continued into February 1989. After soil removal, several rounds of sampling were begun to determine if the site had been cleaned up to meet the Missouri Department of Health and Senior Services' (DHSS) health-based standards for barium, chromium, and lead.

Monitoring showed that lead is the only parameter still exceeding applicable standards. The city did several additional removals of material from the ponds; yet, in places, the lead level still exceeds standards. Sampling of residual water in the ponds and groundwater in the vicinity showed that the site is not causing water pollution problems.

General Geologic and Hydrologic Setting:

Residual soils that have developed from Mississippian-age limestone are present at the site. The residuum contains a high percentage of stone in a clay matrix. Permeability of the material is high. Residuum thickness in the vicinity of the lagoons is estimated to be 10 feet; however, the area has been reworked, and some of the soil may have been removed.

Below the soil is a cherty, Mississippian-age limestone, which extends 80 to 120 feet below the surface. This limestone has undergone extensive weathering, producing subsurface cavities that provide avenues for water movement. Mining ores are present at a depth of about 80 feet. Room and pillar mining methods have been used to remove the ore. Consequently, numerous mine shafts occur on and around the property, and extensively-mined areas occur beneath the site. Large voids created by the mining activities are now filled with water, and large chat piles are present along the eastern and southern property lines. Potential for catastrophic collapse exists at the site, due to both the nature of the underlying bedrock and subsidence from the mining activity.

Two aquifers exist in the area: a shallow aquifer consisting of Mississippian-age limestone at the zone of mineralization and a deep aquifer consisting of Cambro-Ordovician sandstone, dolomite and chert, located well below the ore-bearing strata. Surface and shallow groundwater movement in the area of the lagoons is generally to the east toward Leadville Hollow, and to the north toward Turkey Creek, a gaining stream. Due to the permeable nature of the soil and bedrock material, shallow groundwater is anticipated to be adversely affected by the site.

Public Drinking Water Advisory:

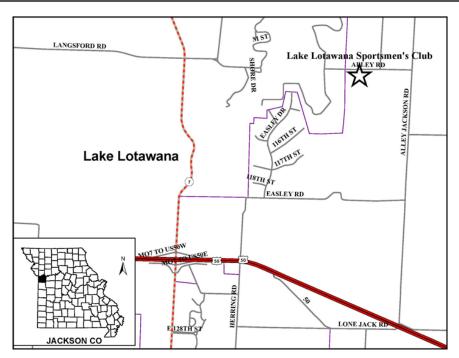
Numerous public water systems surround this site. The nearest well is 1.5 miles north of the site. This is a new well proposed to serve Jasper Co. PWSD #1. Many new wells are being constructed in the Joplin area as current demand outstrips the available groundwater. The water level in the deep aquifer has been lowered in the vicinity of public wells. This increases the likelihood that water from the shallow aquifer can be drawn through the local confining unit and into the regional drinking water aquifer.

Health Assessment:

Routes of exposure include ingestion, direct contact, and inhalation. Present or future use of the property could result in exposure via dermal contact, inhalation or ingestion of contaminated soils or liquids. Although the area is sparsely populated, residents in the area could be affected if the groundwater used for drinking were to become contaminated. Future development of adjacent properties could potentially increase the population at risk. Off-site migration of chemicals occurred in the past due to seepage from one of the ponds. Some exposure through inhalation of dust or dermal contact could be occurring since solid waste is being dumped near the lagoons.

Contaminated water and much of the sludge and soil were removed during a 1988 cleanup. Several samples taken after this cleanup found levels of lead in the lagoon bottom and sides above the DHSS' recommended level. Joplin had planned to perform additional removal of material from the ponds, which would have minimized exposure and risk to the public's health. However, no remedial work has been performed for a number of years. The video monitoring initiated by the city to prevent dumping was discontinued several years ago. Based upon available information, this site remains a public health threat.

Lake Lotawana Sportsmen's Club



Site Name: Lake Lotawana Sportsmen's

Club

Classification: Class 3

Date of Registry Placement: July 31, 2001

<u>Site Address:</u> 29709 Alley Road, Lake Lotawana, Jackson County, Missouri

Present Property Owner: Lake Lotawana

Sportsmen's Club, Inc.

Lead Agency: DNR

Waste Type: Lead

Quantity: Not determined

Site Description:

The Lake Lotawana Sportsmen's Club Site is an active, private sport club that has operated as a recreational small arms firing range since 1977 under a special-use permit from Jackson County. The site, approximately 60 acres in size, has unrestricted access and is surrounded by nearby residences.

A formal complaint was registered with the Missouri Department of Natural Resources (the department) regarding possible lead

contamination. The site was referred to the department's Hazardous Waste Program (HWP) for investigation in September 2000. A Pre-CERCLIS (Comprehensive Environmental Response, Compensation and Liability Information System) Site Screening (SS) investigation was completed by the HWP on March 29, 2001. Lead, associated with the operation of the firing range, is the primary waste of concern.

Environmental Problems and Areas of Concern Related to Site:

Surface soils contain elevated concentrations of lead as high as 4,700 parts per million (ppm). One sample contained leachable lead at a concentration of 181 ppm, exceeding the Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit of 5.0 ppm, making this sample characteristic hazardous waste based on toxicity. Low concentrations of lead were detected in downgradient sediment samples collected from an intermittent stream indicating that some lead is migrating off site. However, no significant accumulation of lead is expected in the stream.

Remedial Action at the Site:

The SS investigation concluded that, under current site conditions, no significant exposure risk is present through the soil pathway or

surface water pathway. Access to the contaminated soil is limited as long as the site remains a firing range. Further action under CERCLA authority was not recommended provided that institutional controls are in place and state oversight of future activities is ensured. The site was placed on the Missouri Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Site on July 31, 2001. The site may be eligible for further CERCLA investigation if the firing range is closed and the property is used for other purposes, such as residential development, thereby increasing the risk of exposure to lead-contaminated soil.

Investigation of this site was reopened due to a citizen's concerns after flooding in June 2013, regarding the potential for lead and other firearms-related constituents to have migrated off of the firing ranges into nearby Lake Lotawana via two intermittent streams which converge on the LLSC property. It was noted in the 2013 Registry annual site inspection that the flooding was significant enough to cause erosion in the form of a big gully in the trap shooting range area where the debris lands. Also hundreds of plastic shotgun waddings were washed downstream and into Lake Lotawana. The concerned citizen of Lake Lotawana suspected that if the wadding material made it to the lake, lead contaminated soil from the shooting range may have also transported to the lake in the flood waters.

In July 2013, the department conducted surface water and sediment sampling of the intermittent creeks that receive drainage from the shooting range. A release of hazardous substances, specifically lead and polycyclic aromatic hydrocarbons (PAHs), was documented in the sediment of the creek on club property and downstream, off club property, at the creek outflow to Lake Lotawana. The levels of lead in the creek sediment exceed environmental sediment quality standards but not residential health based benchmarks. The levels of PAHs exceed both environmental sediment quality standards and EPA's residential and industrial health based benchmarks. The PAH contamination is associated with the clay targets used at shooting ranges. Surface water samples from the creek do not show any PAH contamination, and the relatively low levels of dissolved lead in the water are below Missouri Water Quality Standards. Further,

fish tissue samples collected from Lake Lotawana in August of 2013 did not show any lead contamination at levels of health concern. Only 2 of 9 samples contained any detectable levels of lead – both more than 10 times below the Missouri Fish Fillet Advisory Concentration.

The department will conduct further sampling of sediment from the intermittent creek on the neighboring property and in Lake Lotawana to define the extent of site contamination migration. Further, a Health Consultation from the Missouri Department of Health and Senior Services (DHSS) to evaluate the risk of exposure to residents who may come into contact with creek sediment will be requested. Recommendations in DHSS's Health Consultation will be used to make a decision regarding whether cleanup of contaminated sediments in the creek is warranted.

General Geologic and Hydrologic Setting:

The site is located in the Osage Plains subdivision of the Central Lowlands physiographic province, just south of the inferred southern limit of glaciation. This area has narrow, thin loess-covered ridges composed of moderately permeable silt and silty clay, with low permeable clay increasing with depth, and a thickness of 10 to 20 feet. Drainageways dissect these ridges. Below the loess-covered ridge, the slope is steeper, and the loess has been eroded, exposing residual soil five feet thick or less, composed of more permeable stoney silty clay.

Pennsylvanian-age bedrock of lower Kansas City Group consists of cyclic deposits of shale and limestone with low overall permeability. Groundwater, which accumulates on Pennsylvanian-age shales, is pumped from shallow wells. The depth to groundwater is about 30 to 40 feet below ground surface. A perched seasonal water table of two to three feet has been reported for soils on the steeper side slopes. Local shallow groundwater flow is expected to mimic topography and flow to the southwest toward Lake Lotawana. Regional groundwater flow is expected to be to the north toward the Missouri River. The aguifer underlying the site contains thick limestone units that yield water from bedding planes, fractured intervals and above shales. Recharge to the aguifer in this area is very

limited, only from direct precipitation infiltration. The Kansas City Group is underlain by thick shale of the Pleasanton Group, which is considered to be non-water-bearing and a barrier to deeper, highly mineralized water-bearing units.

Surface water flows south to an intermittent stream that enters Lake Lotawana. Lake Lotawana discharges to the West Fork of the Sni-A-Bar Creek. Sni-A-Bar Creek enters the Missouri River in western Lafayette County.

The potential for groundwater contamination is low to moderate in this area due to low permeabilities of the underlying bedrock. Surface water is much more susceptible to contamination than the groundwater system.

Public Drinking Water Advisory:

Lake Lotawana and the unincorporated area to the east and south of Lake Lotawana are all served by Jackson County Public Water Supply District #15 which buys water from Independence and Kansas City. No sources of public drinking water are affected.

Health Assessment:

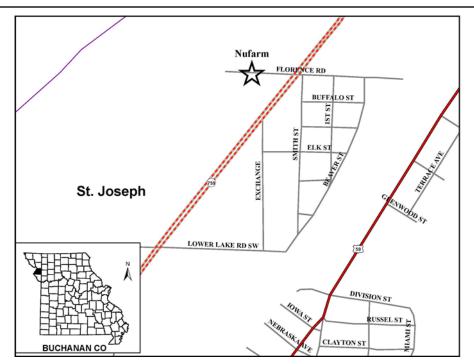
Lead attacks the kidneys, blood, gingival tissue, gastrointestinal tract, reproductive, and central nervous system. At high levels, lead may decrease reaction time, cause weakness in fingers, wrists or ankles, and possibly affect

the memory. Prolonged exposure to elevated levels causes decreased IQ's and behavioral problems in children. Lead can also cause neuromuscular effects and high blood pressure in adults.

The primary health concern is human exposure from ingestion and inhalation. Club members and the general public may incidentally ingest and inhale unacceptable amounts of lead-contaminated dust by way of shooting activities at the site. Lead released to the air may travel long distances before settling to the ground. Tracking of lead-contaminated dust off site is a primary health concern because of the documented high levels found throughout the area.

Based on available information, a health

threat exists. In order to accurately assess the impact this site may have on public health, more thorough characterization is needed.



Site Name: Nufarm

Classification: Class 3

Date of Registry Placement: August 3, 1998

<u>Site Address</u>: 317 Florence Road, St. Joseph, Buchanan County, Missouri, Sec.19, T 47N, R 35W, St. Joseph South Quadrangle

Present Property Owners: HPI

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin) and

2,4,5,-TP (Silvex)

Quantity: Not determined

Site Description:

In 1956, Amchem Products began operation of a herbicide formulation and metalworking products facility in St. Joseph on a parcel of 7.84 acres. Amchem formulated herbicides that primarily contained the active ingredients 2,4-D and 2,4,5-T. These formulations sometimes produced the unwanted byproduct dioxin. The facility ceased formulating these herbicides in 1975.

Soon thereafter, Union Carbide purchased the property and formulated other herbicides. In 1986, Rhone-Poulenc bought the herbicide formulation facility. The company acquired only the property (2.5 acres) that contained the facility. Union Carbide retained the remaining 5.34 vacant acres. In December 1997, Rhone-Poulenc sold the 2.5-acre property and facility to Nufarm, Inc.

Contamination at the two properties dates from the period between 1956 and 1975. when herbicides containing dioxin were formulated. The property retained by Union Carbide is the former location of a lagoon used for waste disposal. The 2.5 acre Nufarm Site contains the storage tank and rail area, where railcars transporting chemicals and herbicides were loaded and unloaded. Spillage during the loading process is the probable source of soil contamination. In 1985, samples taken by the EPA show dioxin levels at 7.1 ppb in the rail area and at 4.5 and 3.4 ppb at the surface in the storage tanks area. The common cleanup standard for dioxin was 1 ppb at less than 1 foot in depth or 10 ppb at greater than 1 foot. The Nufarm Site is south of the Union Carbide Site. Both properties are listed on the Registry. The site is fenced with a locked gate.

Environmental Problems and Areas of Concern Related to Site:

The Missouri River is about 50 yards away. Groundwater has not been thoroughly evaluated at the site.

Remedial Actions at Site:

Samples were collected in 1988, by Pacific Environmental Services for Union Carbide. No dioxin was detected in the railcar area although 2,4-D was found at a low level. The tank storage area, which is near workers and is heavily trafficked, was not resampled. The area may have been capped due to heavy traffic and, for this reason, was not sampled.

Because of planned repairs to the deteriorated rail siding, a soil characterization study was initiated in July 1995. One sample revealed dioxin at 1.1 ppb. The value was later revised following retesting; the retested value was 0.41 ppb. In this area, about 1 foot of gravel had to be excavated before soil was encountered. However, 2,4,5-TP (silvex) failed the Toxicity Characteristic Leaching Procedure (TCLP) at 4.6 ppm when all sample areas were composited.

General Geologic and Hydrologic Setting:

The Nufarm Site is located on the alluvium of the Missouri River flood plain. The 60 to 100-foot thick alluvium consists of low permeability, fine grained clay and silt at the surface, grading with depth to coarser sand and gravel units with high permeability. Sand units are typically encountered within 20 feet below grade, and the gravel seams are present nearer the alluvium/bedrock contact. Depth to the water table is 10 to 20 feet. The alluvial aquifer, which is an important source of water for local industry, is in direct hydraulic communication with the Missouri River.

Under normal flow conditions, groundwater beneath the site flows west toward the Missouri River. The river occasionally floods the site. High river stages could reverse the groundwater flow direction. High-yield wells in the vicinity of the site may also affect the direction of groundwater flow. Release of contaminants at the site would readily affect the alluvial aquifer through direct infiltration

and dissolution.

The bedrock beneath the site is composed of Pennsylvanian-age limestones and shales. Since this type of bedrock exhibits low permeability, release of contaminants would have minimal effect on the bedrock aquifer. Due to the heavy mineralization of water within the bedrock, this aquifer is not used as a water source.

Public Drinking Water Advisory:

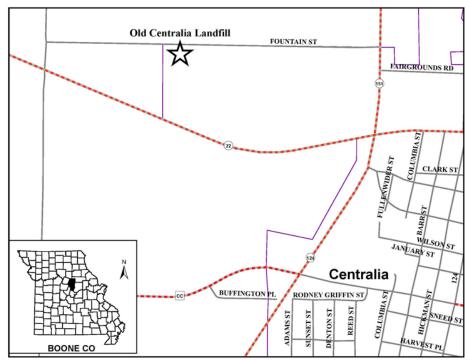
The site is downstream from St. Joseph's former drinking water river intake and the new drinking water well field. No other sources of public drinking water are in this area, and none should be affected by this site.

Health Assessment:

"Dioxins" refer to a group of chemical compounds that share similar chemical structure and biological characteristics. Of the dioxin compounds, 2,3,7,8-TCDD is the most toxic. Animal studies have shown that dioxin-like compounds produce acnegenic, carcinogenic, immunogenic, mutagenic, fetotoxic and teratogenic effects. In humans, it sometimes has an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's Lymphoma, Hodgkin's disease, and porphyria cutanea tarda.

The site is located in an industrial area, but residential neighborhoods are less than 1 mile north and less than one-half mile southeast. The site is fenced and much of the dioxin contamination on the Union Carbide Site is subsurface, covered by clean soil and gravel. Samples taken on the site were near the surface and accessible to employees.

Based on these soil sample results, a potential health risk exists at this site.



Site Name: Old Centralia Landfill

Classification: Class 3

<u>Date of Registry Placement</u>: August 20, 1990

<u>Site Address:</u> 0.6 miles west of Centralia, Boone County, Missouri, along north side of Highway 22, SE 1/4, NW 1/4, Sec. 9, T. 51N, R. 11W, Centralia Quadrangle

Present Property Owner: City of Centralia

Lead Agency: DNR

Waste Type: Metals (primarily lead)

Quantity: Not determined

Site Description:

From 1950 to 1961, the city of Centralia operated the Old Centralia Landfill for the disposal of municipal and industrial solid waste. The landfill was operated as an open dump that was occasionally "open burned" and covered with soil. Missouri Department of Natural Resources' (the department) reports indicate unknown quantities of potentially hazardous materials, generated by the A. B.

Chance Company, also were disposed periodically at the landfill and burned in the open. Analytical results substantiate that hazardous materials were disposed at the site. Soil samples contain metals at elevated levels. Lead has been identified as the primary contaminant of concern in the soil at the northeast corner of the landfill. Lead levels detected in this area are significantly above background and health-based screening levels, thereby characterizing this material as hazardous. The site has been inactive since 1961.

Land in the immediate vicinity is used primarily for agricultural row crops. Houses are scattered in all directions except to the east where Centralia lies. The nearest residence is about 0.5 miles. Goodwater Creek flows on the east side of the site.

Environmental Problems and Areas of Concern Related to Site:

Vegetation has been damaged, with possible residual effects on growth. Vegetation is very sparse in the lime dump area. In 2002, soil on the north end of the site was re-worked to control erosion. Elevated metals detected in sediment samples from nearby Goodwater Creek indicate metals have migrated. Past

leachate seeps have been documented.

Remedial Actions at Site:

The department completed a Site Inspection in 1990, and forwarded the results to the EPA. The department requested that the EPA assess this site for a potential removal cleanup under Superfund.

During 1992, the city of Centralia fenced the site, posted "No Trespassing" signs, and installed a locked gate to eliminate access. However, since 1992, annual inspections by the department repeatedly find the signs and gate damaged or inoperable. Debris found also indicates trespassing.

General Geologic and Hydrologic Setting:

The site is located in an upland setting on a nearly flat, glaciated plain and is characterized by 50 to 60 feet of glacial till, overlain by 3 to 5 feet of loess topped with two to three feet of silty clay. Sand and gravel lenses may be present in the glacial till, but coarse-grained deposits are not continuous over a wide area. This profile represents undisturbed conditions; the depth of the landfill cut and the origin of the cover is unknown.

Geologic mapping indicates that underlying bedrock is composed of Pennsylvanian-age shales, limestones, clay, and coal beds. The glacial till and shaley bedrock have low permeability and thus form a confining layer that minimizes leachate migration into deeper groundwater supplies. Only shallow or poorly-constructed wells would be affected.

Public Drinking Water Advisory:

Boone County Public Water Supply District No. 10 is located 0.25 miles southwest of the site. The city of Centralia is served by three deep wells located 1.25 to 2.25 miles from the site. Nearly all wells are about 1,400 feet deep with a minimum of 460 feet of casing. They draw water from the Gasconade Formation of Ordovician age. According to the department's Geological Survey and Resource Assessment Division, the bedrock aquifers in the area (and, therefore, the city wells) would not be expected to be significantly impacted by potential releases

from the site.

Health Assessment:

The following are the major contaminants of concern found in soil, surface water, and sediment: copper, lead, nickel, and phenathrene, a polycyclic aromatic hydrocarbon (PAH). Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

The most likely routes of exposure are through direct contact with contaminated soil, sediment, and surface water. Elevated levels of copper, lead and nickel were found in the soil of the northeast corner of the site. Analysis of down gradient sediment and water samples indicated that contaminants have moved off site. Even though phenathrene was found in only one sample, the presence of phenathrene and other PAHs is expected because of past burning practices.

According to the annual inspection report dated May 30, 2007, a sewage line has been installed on the site. Also, sludge from the water plant is being surface applied to the site. Disturbances of the site cover may pose risk to workers and visitors exposed to disturbed surface soils that may be contaminated, and exposure to debris during invasive work in landfill areas. The area where sludge is applied is devoid of vegetation, posing additional risk from exposure to contaminant in the sludge.

Based upon historic surface water and sediment sample results, contamination of surface water presents a health concern. Contamination of Goodwater Creek is of some concern to public health as the creek ultimately empties into Mark Twain Lake.

The potential for groundwater contamination exists. Seepage from the buried wastes is occurring, and in time, contaminants could reach the groundwater. Centralia is served by two deep wells, but there are limited reports of other groundwater use in the immediate vicinity. Centralia and most rural homes in the Old Centralia Landfill vicinity utilize public water. The Missouri Department of Health

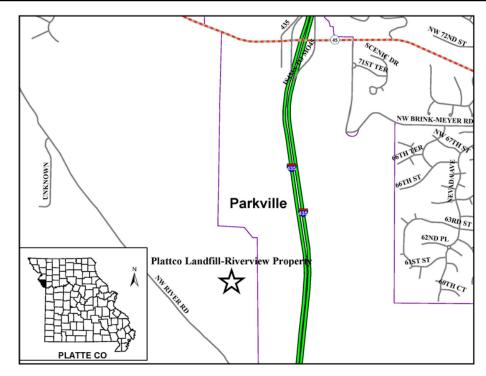
and Senior Services samples private wells near the site annually, and have never detected any contaminants in the water.

Based on available information, the contaminants in the Old Centralia Landfill Site present a health threat to the general public. The fact that contaminants have moved off site presents a potential risk because they are persistent in the environment and could eventually flow into Mark Twain Lake. Other considerations are that (1) the contaminants could migrate into the groundwater, (2) soil erosion and surface water ponding is increasing, (3) the public may disregard the access restrictions and become exposed when trespassing, and (4) the maintenance of a utility transecting the site may expose workers to surface and subsurface soil contamination, and to landfill material.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Class 3 Sites 108 Old Centralia Landfill

Plattco Landfill-Riverview Property



Site Name: Plattco Landfill-Riverview

Property

Classification: Class 3

Date of Registry Placement: September 14,

1998

<u>Site Address</u>: FF Hwy, Parkville, Platte County, Missouri, Sec. 30, T. 51N, R. 34W,

Wolcott Quadrangle

Present Property Owners: Browning-Ferris

Industries (BFI)

Lead Agency: DNR

Waste Type: Industrial waste

Quantity: Not determined

Site Description:

This site is one of two contiguous landfill properties owned BFI of Kansas City. The Plattco Landfill-Riverview property is the earliest landfill, encompassing about 70 acres. Previously owned by the Riverview Land Association, it was operated by Doepke Disposal as a sanitary landfill from 1969 until 1971. In 1971, Doepke Disposal was

purchased by BFI who continued to operate the landfill until its closure in 1978. While the original site was undergoing closure, an expansion site of about 60 acres was permitted by the Department of Natural Resources (the department) for operation as a sanitary landfill. The second site, owned by Mr. and Mrs. Frank Douglas, was leased by BFI. It adjoins the original landfill on the north side.

Prior to the Resource Conservation and Recovery Act (RCRA) and between 1969 and 1972, a variety of industrial and residential wastes were deposited at this site. Since formal waste identification records and transport receipts are non-existent, the exact quantities and characteristics of industrial waste in the landfill are unknown. However, intermittent inspection reports by the Department of Health and Senior Services (DHSS), and statements by the former operator, A.W. Doepke, indicate that until 1972, the landfill did accept waste liquids, sludges and solids from local commercial and industrial operations. The presence of ignitable, corrosive and toxic wastes in significant quantities is highly probable, though unconfirmed.

The wastes reportedly disposed at the site

include wastewater treatment sludges and refinery sludges from industrial firms such as Mobay Chemical (Chemagro), Amoco Oil Refinery-Sugar Creek, Phillips Petroleum, Hobart Manufacturing, General Motors, Trans World Airlines, and Sealright Manufacturing. Clarifier sludges, filtration sludges, paint sludges, solvent wastes, off-spec pesticides, refractory slag, and air pollution residues were allegedly deposited by the waste generators named above.

Sometime in 1972, acceptance of liquid and semi-liquid industrial wastes at the Plattco Landfill was discontinued, according to past and present BFI officials. However, the landfill continued to accept treatment sludges, refinery wastes and air pollution control residues. Some of these wastes were commingled with solid wastes at the landfill face, but the bulk of the wastes (including Chemagro sulfur and manganese dioxide residues) were deposited in special waste trenches on the eastern and southeastern quadrants of the landfill site.

Quantifying the amount of waste on site is difficult due to the lack of records detailing the types and quantities of wastes deposited in the initial landfill prior to 1977. However, preliminary observation suggests that organophosphate and organochlorine pesticide wastes, paint waste, halogenated and non-halogenated solvents, petroleum sludges and residues containing heavy metals are present at the initial landfill site. Officials from BFI speculate that some of the wastes disposed at Plattco in the EPA notifications were, in fact, disposed at the Missouri City permitted hazardous waste landfill (also listed on the Registry), operated by BFI beginning in 1974. This assertion is unconfirmed.

Environmental Problems and Areas of Concern Related to Site:

This site is within the Missouri River flood plain and within 0.25 miles of Rush Creek. The annual Registry inspection report noted some erosion in drainage areas. A fence surrounds the site and gates are locked.

Remedial Actions at Site:

Results from a 1982 sampling event indicated

trace amounts of dichloroethane, methylene chloride and trichloroethylene in a leachate sample taken from the sump. Runoff from the landfill to the siltation pond may have diluted contaminant concentrations to below the detectable levels. On April 3, 1985, sampling was conducted at both landfill sites. Downstream samples indicated elevated levels of Group III metals and some heavy metals. Samples obtained from the siltation pond and leachate collection sump revealed detectable levels of chlorinated alkanes, ethyl benzene phenols, phthalates, and pesticide components. Preliminary indications revealed an increased presence of priority contaminants in the upgradient sedimentation pond used previously as a reservoir for returned leachate. Minimal levels of heavy metals (primarily barium and chromium) were observed in the sediment and leachate samples. Sampling and analysis of surface water and leachate streams generated from the landfill have not revealed consistent. detectable levels of priority pollutants. However, the presence of organic and inorganic contaminants has been documented on several occasions.

In December 1997, this site received approval for final closure from the department's Solid Waste Management Program (SWMP). BFI contracted with Heritage Environmental to conduct quarterly sampling of the leachate being collected at the landfill. In 1998, samples were analyzed for hazardous waste characteristics using the Toxicity Characteristic Leaching Procedure (TCLP), and results did not exceed any TCLP regulatory levels. The SWMP reports that Plattco Landfill is currently in compliance with its closure requirements.

General Geologic and Hydrologic Setting:

The site is located on the bluffs above the Missouri River. The bluffs rise over 220 feet above the Missouri River flood plain. Exposed at the base of the bluffs are Pennsylvanianage limestones and shales. The Pennsylvanian bedrock beneath the site exhibits typically low permeability; release of contaminants would have minimal effect on the bedrock aquifer.

The bedrock is mantled with a thick (about 70

feet) cover of Wisconsin-age loess and glacial till. The loess consists primarily of silt, but the till can contain silt, sand, extensive sand stringers, and pebbles. Loess and glacial till are usually considered to be of low to moderate permeability, but till can be highly permeable where sand stringers are present. Depth to the water table can vary greatly over a short distance, due to the presence or absence of saturated sand stringers.

Saturated sand stringers serve as individual domestic water resources for both household and stock use. Individual sand stringers are isolated and seldom extend more than a few hundred feet. Contamination released to a sand aquifer would be limited in extent to localized areas adjacent to the site.

Surficial water drains from the site and flows off the bluffs to enter Brush Creek. Brush Creek meanders across the alluvium of the Missouri River. The alluvium consist of 60 to 100 feet of low permeability fine-grained clay and silt at the surface, grading with depth to coarser sand and gravel units of high permeability. Brush Creek is in direct hydraulic communication with the alluvial aquifer. Well records indicate that the alluvial aquifer currently is not being used as a drinking water source in this area.

Public Drinking Water Advisory:

This site is 4.5 miles from the Parkville well field. Public drinking water sources should not be affected by this site.

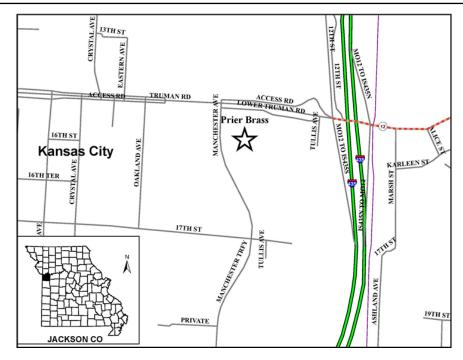
Health Assessment:

The uncertainty associated with the types and volume of hazardous waste makes it difficult to discuss possible health effects. Some

pesticides affect the nervous system directly while many interfere with cholinesterase and suppress the transmission of nerve impulses. Most solvents are central nervous system depressants that can also cause dry skin and dermatitis. Some are carcinogenic. Heavy metals can cause a variety of health symptoms, including negative effects on every organ system.

Presently, the only observed route of contaminant migration off site is the discharge periodically observed emanating from the leachate collection sump area. A leachate collection system, siltation basin, and underground sump have obviously been neglected. This has been considered the main source of off-site migration of waste. A creek flows just north of the site. A camp for children is located 0.4 miles to the north. A shooting range is located to the east with a pond located on the southwest part of the range. Overland flow of surface discharge could lead to exposure through ingestion of contaminated surface water or groundwater. Contamination of the Missouri River alluvial aguifer may also be possible. A section of fence on the south (Riverview) portion of the site remains absent.

Based on the available information and given the absence of local groundwater sampling data, the potential for direct exposure exists. Given the uncertainty of the types and concentrations of hazardous substances disposed of at this site, the potential for adverse effects cannot be discounted.



Site Name: Prier Brass Manufacturing

Company

Classification: Class 3

Date of Registry Placement: July 14, 1986

<u>Site Address:</u> 7801 Truman Road, Kansas City, Jackson County, Missouri, Independence Quadrangle

Present Property Owner: WCA-KC

Transfer, LLC

Lead Agency: EPA

Waste Type: Lead and cadmium

Quantity: Not determined

Site Description:

Located in an industrial area of Kansas City, this facility formerly housed a manufacturer of various brass products. The manufacturer operated from 1907 until 1985 before going bankrupt. Lead-contaminated foundry wastes and baghouse dust were dumped here over a period of several years. A March 1993, fire at the abandoned facility destroyed roof structures and building interiors.

CST, L.L.P. purchased a portion of the site in 1997. Garages were constructed for the maintenance of vehicles and other uses such as repairing skids. Extensive grading with gravel cover was performed on the eastern section, and new concrete paving was poured in several areas. Access to the property is restricted by a fence and gate; however, the site is accessible from the Big Blue River side.

Environmental Problems and Areas of Concern Related to Site:

The potential for groundwater contamination at the site exists. The Big Blue River rechannelization project by the U. S. Army Corps of Engineers began in 1996 and moved the channel away from the facility. A new segment of Manchester Street was constructed between the west side of the facility and the Blue River.

Remedial Actions at Site:

The Department of Natural Resources (the department) conducted both an Site Inspection (SI) and a Preliminary Assessment (PA) of the site. Extraction Procedure toxicity tests revealed that the foundry sand contained unacceptable levels of leachable lead and that the baghouse dust contained unacceptable

levels of leachable lead and cadmium. The department referred the site to the U.S. Environmental Protection Agency (EPA) for conduct a removal assessment. The EPA sampled and assessed the site to determine the extent of contamination. The EPA completed a removal action in February 1996. Contaminated material was removed, stabilized, and shipped off site for disposal. The EPA designated 1,000 parts per million as the lead action level. The excavated areas were filled with clean fill. Additional cleanup actions are not planned.

Contaminated foundry wastes remain under a portion of the building. The EPA and the Agency for Toxic Substances and Disease Registry determined that leaving the waste underneath the building is protective of human health. On June 16, 1997, the EPA and CST, L.L.P., entered into a prospective purchaser agreement for a portion of the Registry site that CST purchased. The department approved a change in use request made by CST for development of the site as an operational base for a construction company.

CST submitted to EPA a change in use to include a material recovery facility at the site. EPA is reviewing proposed construction activities. CST sold their interest in the building to Manchester Transfer in 2004. The department's Solid Waste Program issued the owner in succession, Manchester Transfer, LLC, a solid waste permit in May 2005. In 2012, Manchester Transfer LLC sold the property to C Rae Properties, LLC. The EPA Covenant Not to Sue was transferred to C Rae Properties LLC in December 2012.

In 2014, WCA-KC Transfer LLC purchased the property. EPA moved forward with transferring the existing agreement and Covenant Not to Sue to WCA–KC Transfer LLC. However, EPA added language that requires the new owner to convert to the Uniform Environmental Covenants Act (UECA) process during their ownership, i.e. before the property is transferred again. The Covenant not to Sue was transferred to the new owner WCA-KC Transfer, LLC on July 31, 2014, with the added language about UECA. The new owners indicated that they are willing to convert to UECA as long as the land use restrictions remain the same.

General Geologic and Hydrologic Setting:

The site is located next to the Blue River. On site soils are a mixture of fill material, underlain by alluvial deposits of clay, silt, sand and gravel. Bedrock at depth is composed principally of interbedded shale and limestone. Typically, the bedrock is characterized by low permeability.

The potential exists for off-site contamination on the surface due to the proximity of waste materials to the Blue River. Floodwaters and surface runoff may wash these contaminants into the river. However, the potential for off-site migration via surface water decreased with the completion of a removal action.

Depth to the water table is expected to fluctuate with the river stage, but is probably between 10 and 25 feet below the flood plain surface. Contaminants in solution could potentially affect the shallow groundwater supplies of the Blue River alluvium. Although the alluvial sediments under the area of waste disposal have not been fully characterized, it is likely that the effects of contamination on shallow groundwater are extremely localized.

Public Drinking Water Advisory:

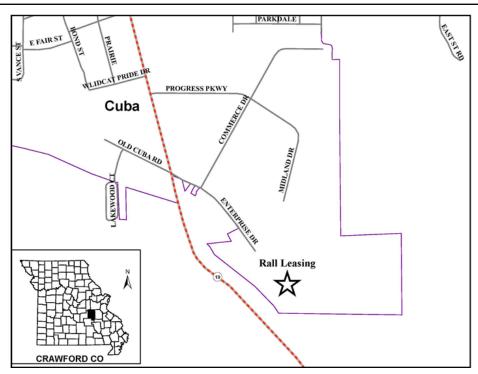
The site is located on the Blue River, about seven miles from its confluence with the Missouri River. The wells serving the city of Independence are located in the Missouri River alluvial plain 10.5 miles downstream from the site. Several major municipalities use the Missouri River as a source of drinking water. The one nearest the Prier Brass Site is Lexington which is 42 miles downstream. Unless a major release of contaminants occurs, the site is not expected to significantly impact downstream water systems.

Health Assessment:

Lead attacks the central nervous system, kidneys, blood, intestinal tract, and gingival tissue. Prolonged exposure can cause irreversible damage. Developing fetuses and children are especially susceptible to permanent central nervous system damage. Cadmium attacks the lungs, blood, respiratory tract, and prostate.

CST, L.L.P. owns the property, which is now being used by Manchester Transfer & Recycling. The previously installed four-inch layer of gravel, has been pressed down into the ground leaving exposed soil which becomes muddy and puddles when it rains. The large smoke stack has been removed as well as the east side section of the building and the paved rear dock leaving previously covered areas accessible to visitors and workers. A truck weigh station has been installed, which required excavation of the site allowing exposure to previously buried baghouse wastes. A small building used for an office has also been constructed in this area adjacent to the Big Blue River channel.

Soils under buildings were not previously sampled or cleaned up because they were deemed inaccessible. Reoccupation by a new tenant and structural changes on the site raises the possibility of exposure to contaminants previously covered by the building, pavement, and gravel. Based on this information a health threat may exist to workers and visitors. The site needs to be investigated and characterized due to the extensive changes that have taken place. Soils in areas where extensive changes have occurred need to be made inaccessible or sampled to determine if workers are at risk from exposure to lead and cadmium.



Site Name: Rall Leasing

Classification: Class 3

Date of Registry Placement: July 25, 1995

<u>Site Address:</u> South of Cuba, Crawford County, Missouri - Within Industrial Park, East of Hwy. 19, NE 1/4, NE 1/4, Section 6, T. 38N, R. 4W

Present Property Owner: Rall Leasing

Associates, a partnership

Lead Agency: DNR

Waste Type: Trichloroethylene (TCE)

Quantity: Not determined

Site Description:

Durban-Durco owned and operated the site as an automobile parts manufacturing facility in cooperation with B & K Manufacturing from 1970 to 1985. During this time, as part of manufacturing process, a cleaning agent was used that contained TCE. Reportedly, the chemical was used until no longer effective and was then discarded onto the ground outside the main warehouse. In 1985, the site

was purchased by Rall Leasing, Ltd. Mr. Lee Young was the primary share holder of the property.

In the February 1990, sampling event, soil samples collected from four borings from points on the west side of the main building had levels of TCE up to 1,600 parts per million (ppm). The highest level detected in the subsequent March 1991, sampling was 46.5 ppm. Based on soil sampling results from the 1990 environmental audit, the Rall Leasing site was placed on the Registry on July 25,1995, groundwater samples were not collected during the 1990 or the 1991 sampling events.

From 1997 to 2007, several private wells, surrounding the Rall Leasing site, were sampled by the Missouri Department of Health and Senior Services (DHSS) and department staff. Sample results indicated there was not a significant threat to nearby private drinking water wells.

In March 2007, Mr. Young of Rall Leasing, Ltd. passed away leaving the property to his nephew, Mr. Greg Ecklekamp. SPS, Inc. leases the property from the owner and since approximately 1994 operates a plastic recycling company on the site. The warehouse is being used as a plastic storage facility.

On September 5, 2007, after a Registry inspection, the site was referred to the department's Superfund Section for investigation of abandoned drums on the site. A site reconnaissance was conducted for the Pre-CERCLIS Site Screening (SS) investigation on November 19, 2007. Department personnel met with Mr. Upendra Naik, the owner of SPS, at the Rall Leasing site, and he accompanied staff during the site inspection.

Department staff discovered approximately 196 drums containing a variety of chemicals. Some of these chemicals include: waste terpinolene 3, butyl lactate, waste methyl methacrylate monomer, waste toxic solid (selenium and cadmium), waste paint related material, waste naphthalene, etc. The drums were located throughout the property in outbuildings as well as in the warehouse. Numerous drums were in poor condition and showed signs of possible leaking. The SPS plant manager reported that the drums did not belong to SPS, but were left by previous tenants of the property. The owner of the property, Mr. Ecklekamp, subsequently informed department staff that he had hired a contractor to characterize and properly dispose of the drums. Midwest Environmental Consultants informed DNR staff that removal was to proceed on December 19, 2007.

On December 21, 2007, department staff revisited the site and found that 60 of the drums had been removed and were informed that plans had been established to remove the remaining drums. The drums were taken to Solvent Recovery Corporation in Kansas City, Kansas. The property owner informed department staff that after the completion of the drum removal, he intended to submit an application with Brownfield Voluntary Cleanup Program (BVCP) to address the TCE contamination and attempt to get the site removed from the Registry.

Environmental Problems and Areas of Concern Related to Site:

The TCE contamination will remain a concern until additional site work proves otherwise. As

well, the some of the drums removed from the site this year were in a deteriorating condition and showed signs of possible leaking. The areas underneath the location of the former drums need to be characterized in order to determine if soil contamination has occurred due to these drums.

Remedial Actions at Site:

Mr. Ecklekamp in the fall of 2007, contracted Midwest Environmental Consultants to characterize and dispose of the drums as well as apply to BVCP. All drums outside the warehouse were disposed of by Midwest Environmental Consultants. The drums were taken to Solvent Recovery Corporation. The property owner has stated his intention is to clean up the TCE contamination and to ultimately get Rall Leasing removed from the Registry.

The site was enrolled in BVCP in March of 2008. A Remedial Action Plan (RAP) for soil removal and groundwater monitoring was approved in December of 2008. Other sampling that was not addressed as part of the RAP may also be required. No correspondence has been received since approval of the RAP.

General Geologic and Hydrologic Setting:

The Rall Leasing Site is located on a high ridge top extending from a broad upland area at the south edge of the city of Cuba. The land surface is nearly flat, but moderate to steep slopes exist within a short distance to the east and west, where headwater streams of the Meramec River meet the edge of the upland area. Surface water runoff drains either west to Pine Branch or east to a tributary of Lick Creek; both are tributaries of the Meramec River.

Boring logs obtained during site investigations indicate that depth to bedrock varies from 4.5 to 19 feet below the surface. The near-surface bedrock is undifferentiated Pennsylvanian-age sandstones, siltstones, shales, and sand- to boulder-size carbonate pieces. Typically, the unit effectively restricts downward migration of water. The thickness, composition and elevation of this unit may vary considerably over short lateral distances.

Drilling records of wells near the site indicate the thickness of the Pennsylvanian deposits varies from 40 to 70 feet. Ordovician-age cherty dolomite and sandstone bedrock is present beneath the Pennsylvanian bedrock. These Ordovician bedrock units compose the Ozark Aquifer.

Most private drinking water wells in the area are open to the Ozark Aquifer. The water table elevation within this aquifer lies about 200 feet below the surface of the site. Groundwater is anticipated to move in a southerly direction toward the Meramec River. Perched groundwater may also exist in the uppermost bedrock or in overlying surficial materials.

Public Drinking Water Advisory:

The four water supply wells for the city of Cuba are located 1 to 2 miles north of the site. The wells are 600 to 1,050 feet deep, with 300 to 400 feet of casing, and are constructed into consolidated geologic formations. The water system serves about 2,500 people. Although no evidence exists to date of groundwater contamination, migration of contaminants from the site could potentially affect nearby drinking water wells.

Health Assessment:

The chemical of concern in soil is TCE. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with this contaminant.

A site inspection by the department was conducted in May 2008. According to the site inspection report, leaking barrels of unidentified chemicals and waste drums noted during the April 2007 inspection have been removed from the premises. However, the potential for exposure to contaminants other than TCE still exists.

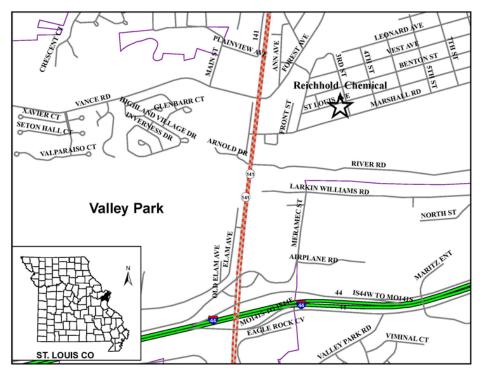
Historic documentation indicates that TCE

contamination at this site has not been characterized, nor has a cleanup been performed. TCE contamination at concentrations injurious to the public's health has been documented in soils at this site. TCE also breaks down into other hazardous by-products including cis-and trans-1,2-dichloroethylene, vinyl chloride, and ethylene. Therefore, a potential for on-site and off-site exposure to TCE and by-products must be assumed. Potential on-site exposures to TCE and by-products include direct contact with contaminated soil and dust, and inhalation of vapors in ambient and indoor air.

In most cases, TCE at concentrations detected at this site will migrate to unconfined and confined groundwater, potentially allowing for off-site exposure to contaminated groundwater. Due to the potential for migration to groundwater, DHSS routinely samples private wells in vicinity. At least eight private wells and two public wells are within a one-mile radius of the site. In 2006, DHSS sampled three private wells for volatile organic chemicals, including TCE. No VOCs or TCE were detected in the samples.

Based on available information, a health threat may exist at this site. In order to accurately assess the impact this site may have on public health, site-related contamination needs to be characterized.

Reichhold Chemical



Site Name: Reichhold Chemical

Classification: Class 3

Date of Registry Placement: March 15, 2001

Site Address: 249 St. Louis Avenue, Valley

Park, St. Louis County, Missouri.

Present Property Owner: Reichhold, Inc.

Lead Agency: DNR

Waste Type: Volatile organic compounds

(VOCs), primarily xylene

Quantity: Not determined; an unknown volume of solvent was released, contaminating about 48,000 cubic feet of soil, which remains on site.

Site Description:

The Reichhold Chemical Site covers 2.5 acres surrounded by industrial, commercial and residential property. Reichhold manufactures oil- and solvent-based resins. As part of the production process, industrial grade xylene is used to remove wastewater from the resin materials. The resulting xylene-wastewater mixture is collected in an aboveground

15,000-gallon decanter recovery tank in which the solvent is separated and retrieved for later reuse. In 1997, a release of an unknown volume of solvent occurred from the decanter tank containment drain. The solvents migrated along the conduit of a buried wastewater line and contaminated soils.

The site, which is fenced securely, is covered with structures and a cement parking lot. The cement parking lot acts as a cap protecting workers and other individuals from potential exposure to subsurface contamination.

Environmental Problems and Areas of Concern Related to Site:

Xylene and ethylbenzene are present at concentrations above health-based screening levels in the subsurface soil. The industrial grade xylene, a recovered chemical product, is listed as U.S. Environmental Protection Agency (EPA) hazardous waste U239. Subsurface contaminants may pose human health risks if accidental uncovering, removal of the cement cap, or excavation would occur.

The site lies above a trichloroethylene (TCE) groundwater plume about 70 acres in size and attributed to the Valley Park TCE Superfund Site. A Remedial Design/Remedial Action

(RD/RA) for groundwater and subsurface contamination is in progress at the Valley Park TCE Site.

Remedial Action at the Site:

After a 1997 release of an unknown volume of solvent from the decanter tank containment drain, the faulty drain was repaired, the decanter tank containment was sealed, and the sewer lateral was plugged with cement to prevent further contamination of the sewer system. A recovery sump was installed in the sewer lateral to retrieve any free solvents that continued to infiltrate, but very little solvent was recovered.

The Department of Natural Resources (the department) completed an Integrated Preliminary Assessement/Site Inspection (PA/SI) Removal Site Evaluation (RSE) in September 2000. The evaluation concluded that the soil contamination is effectively capped by the parking lot. Therefore, further action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) was not recommended provided that institutional controls are in place and state oversight of future activities is ensured.

In May 2003, the department approved a change of use request for excavation and test borings for installation of a new product line. In December 2003, the department approved a change of use request to replace a leaky underground drain line in building 13.

General Geologic and Hydrologic Setting:

The site is located nearly 0.3 mile north of the Meramec River on the 10-year flood plain. The surrounding terrain is flat with no levee between the property and the river. About 65 feet of moderately to highly permeable alluvium underlies the site. According to nearby monitoring wells, the alluvial sediments predominantly comprise silty sand with some clay and gravel in the upper 35 feet, overlying 30 feet of sand and gravel.

Depth to groundwater averages 30 feet and fluctuates with the river level and pumping rates of the Reichhold production well.

Alluvial groundwater is recharged by surface

infiltration and discharge from the bedrock hills located north and west of the site. Groundwater flows within the alluvium toward the Meramec River to the south-southeast. Locally, the alluvial aquifer is used for industrial wells and Kirkwood municipal wells. Bedrock consists of cherty, medium- to coarsely-crystalline 200-foot thick Burlington-Keokuk Limestone. Voids have been found in the limestone bedrock; therefore, it is probably karstic. The bedrock aquifer is used as a drinking water source in the nearby upland areas, but not in the river valley.

Public Drinking Water Advisory:

Kirkwood's alluvial well field is less than two miles downstream. The department's Public Drinking Water Program delineated the recharge areas for alluvial wells and found that the recharge areas can extend for many miles upstream along the river valley. If contaminants from this site pollute the alluvial soil or groundwater, it represents a likely threat to Kirkwood's drinking water source.

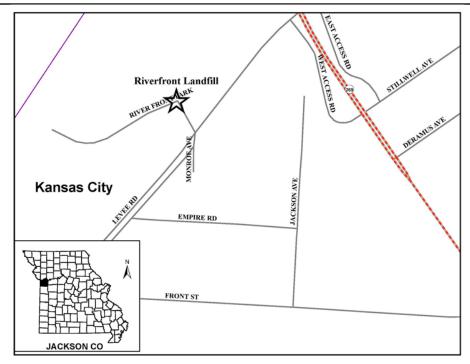
Health Assessment:

Industrial grade xylene typically contains other solvents and may be as much as 30 percent ethylbenzene. Xylene, ethylbenzene, benzene, and toluene are all central nervous system (CNS) depressants. Exposure to xylene, toluene and ethylbenzene can cause headache, dizziness, slurred speech and other symptoms characteristic of CNS depression. In addition, ethylbenzene can cause liver damage. Benzene can produce narcotic effects similar to the other solvents. Benzene can also cause heart damage and is a known human carcinogen (leukemia).

The primary exposure route of concern is through groundwater. Although not currently active, Valley Park's public well field is down gradient and very near the site. A cluster of more than a dozen private wells is also down gradient. The most recent sampling, in September 2006, showed that two of these wells were still impacted from the Valley Park TCE Site, but contaminants from the Reichhold facility were not present.

Based on available information, a health risk exists from this site. Given the location of the

facility, significant impact to groundwater is expected. Excavation of subsurface soil could expose construction workers and site workers to volatile organic compounds in soil and shallow groundwater.



Site Name: Riverfront Landfill

Classification: Class 3

Date of Registry Placement: January 14,

1984

<u>Site Address</u>: Levee Road at Chouteau along the south bank of the Missouri River from River Mile 363.5 to 359.0, Kansas City, Jackson County, Missouri, NW 1/4, Sec. 27; SE 1/4, Sec. 22; N 1/2, Sec. 17; N 1/2, Sec. 16; SW 1/4, NW 1/4, NE 1/4, and SW 1/4, Sec. 15, T. 50N, R. 33W, North Kansas City Quadrangle

Present Property Owner: City of Kansas City

Lead Agency: EPA

<u>Waste Type</u>: Metals, volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs)

Quantity: Not determined

Site Description:

The Riverfront Landfill site is located on the south bank flood plain of the Missouri River in Kansas City, Missouri, and extends southward

to the U.S. Army Corps of Engineers (USACE) East Bottoms Levee. This levee is placed approximately 1,000 feet back from the riverbank and runs the entire length of the site. The site extends eastward from a point about 4,000 feet Southwest of the Chouteau Trafficway Bridge, to a drainage swale adjacent to the Harry S. Truman Bridge. The site is approximately 1,000 feet wide by 3.5 miles long and covers an area of approximately 420 acres.

For descriptive purposes during past studies, the site was divided into three areas. Area I lies to the west of the Chouteau Bridge, Area II is located between the Chouteau and I-435 bridges, while Area III lies to the east of the I-435 Bridge.

Construction of the USACE East Bottoms Levee was completed in 1950. That same year the landfill began operations. From 1950 to 1972, the site operated as a landfill for domestic and industrial waste disposal by the Kansas City Public Works Department. By the late 1960's or early 1970's, operations had moved entirely into Area III between the I-435 Bridge and the Harry S. Truman Bridge.

In June 1981, the City of Kansas City (City) notified the U. S. Environmental Protection

Agency (EPA) that the site might contain hazardous wastes. In response to this notification, the EPA conducted a preliminary site investigation that was completed in 1982. In 1983 and 1984, the EPA performed additional studies which resulted in a recommendation to close the site, including the developed public areas. In November 1985, the Kansas City Parks and Recreation Department closed the Riverfront site.

In June 1987, the EPA and the City signed an Administrative Order on Consent (AOC) to conduct a response investigation. From 1987 to 1990, the City conducted several studies to assess the levels of contamination at the site. In the summer of 1992, portions of the landfill was capped, and Area I was redeveloped as a park. In 2003, the City received approval from the Missouri Department of Natural Resources (the department) to refurbish and reopen the boat ramp in Riverfront Park which gave access to the Missouri River.

Environmental Problems and Areas of Concern Related to Site:

As was common practice in solid waste disposal during the 1950-1972 period, the landfill operated without liners, leachate controls or multilayer final covers. Burning, in combination with land disposal, was the customary practice. Solid wastes were placed in shallow trenches or pits and were often burned and eventually covered with available soil. Most cover soils were sandy silts and silty sand. Liquids were also treated in a similar manner.

Until 1963, waste disposed of at the site was unregulated, and records were inadequately kept. From 1963 to 1968, documentation shows that the landfill accepted a variety of waste, including: domestic, construction, demolition, non-infectious hospital, power plant, general chemical, paint sludges, polishing solvents, and electroplating wastes. When open burning and backyard incineration were prohibited in 1968, an estimated 150,000 domestic burn barrels had been disposed of at the site. After 1968, only domestic wastes and demolition debris were accepted.

Groundwater controlled the depth of excavation. Past studies have indicated that

most trenches were on the order of six to seven feet, although some trenches have been reported to be as deep as 15 feet. The Missouri River alluvium and depth to groundwater is seven feet. Since the site was excavated to the water table and filled without the benefit of a liner, infiltrating materials are likely to contaminate groundwater. Groundwater is used locally for industrial processes. Surface runoff is toward the Missouri River. At one time, final cover material eroded exposing solid wastes which entered the Missouri River, but release of hazardous waste apparently was not involved. Kansas City corrected the problem.

The principal concern is the potential for direct human contact with contaminated surface soils. Before portions of the landfill was capped, soil samples collected from the west end of Area I, also known as Riverfront Park, by the Kansas City Health Department documented elevated lead levels. In addition, burning of liquid wastes, specifically polychlorinated dibenzofurans, may have resulted in polychlorinated biphenyls (PCBs), which are environmentally persistent.

The 2003 annual Registry site inspection report noted that the area east of Chouteau was fenced with locked gates.

Remedial Actions at Site:

In August 1982, surface and subsurface soil samples were taken to establish the types and levels of chemical contaminants. Inorganic metals were found at higher levels than the expected range in alluvial soils. VOCs were found above detection limits. PCB was detected at levels well below the 50 parts per million (ppm) Toxic Substances Control Act standard for old disposal sites. The EPA installed shallow groundwater monitoring wells to investigate potential groundwater contamination. Samples collected by the City in 1984 indicate soils contain concentrations of lead from 49 to 8,000 ppm.

An AOC was issued to the City by the EPA in July 1987 under Section 3013 of the Resource Conservation and Recovery Act and Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act. The AOC required the City to conduct

groundwater monitoring, keep the site closed to the public, and clean up or cap lead-contaminated soil once the groundwater monitoring had been complete.

Groundwater was sampled in January and April 1988. In each round, 18 monitoring wells were sampled. Arsenic, barium, chromium, lead, benzene and vinyl chloride were detected in groundwater at concentrations above the EPA's drinking water standards, the Maximum Contaminant Levels.

In February 1990, the city submitted a final Groundwater Investigation report for Riverfront Landfill with a Groundwater Risk Assessment. Groundwater contour maps indicate that, under normal flow conditions, groundwater flow is toward or parallel to the river. Under abnormally high flow conditions, groundwater flow may be away from the river.

The City planned to cap surface soils contaminated with lead above 500 ppm and reopen Riverfront Park as a recreational use public park. The Missouri Department of Health and Senior Services agreed that capping areas of Riverfront Landfill with lead concentrations above 500 ppm would be protective of human health and the environment, provided that the site remain on the Registry. The site was enrolled in the department's Brownfields Voluntary Cleanup Program but was withdrawn in 1999 with no progress made toward characterization.

Areas II and III are fenced with signs posted around the fence perimeter indicating that those areas of the site are a hazardous waste site. The City capped Area I during the summer of 1992. The flood of 1993 damaged the fence in some areas and impacted the cap. Both were repaired. During fiscal year 1998, a portion of the capped area was disturbed as a result of the Chouteau Bridge relocation. A change of use request was approved for the disturbance. Work on the Chouteau Bridge was completed in the affected area of the landfill. The City continues to monitor groundwater at the site.

The City requested a change of use in January 1999, for the installation of a stormwater drainage sewer through the

landfill. The change was approved. The department approved installation of a stormwater pumping station in January 2000. In 2001, the City submitted a change of use request for maintenance on an outfall pump, including removal of silt and brush from a ditch near the outfall pump. The change was approved.

The state has been working with the City to develop the site for recreational Green Space and to develop a master plan for future use. All areas of the site have been characterized. No compounds were found at levels that would prohibit recreational use.

General Geologic and Hydrologic Setting:

The site is on the Missouri River flood plain. Soil texture may range from clay to sand, but for the most part, the soils are made up of predominantly coarse material with moderate to high permeability.

The site sits directly atop the Missouri River alluvium which is an important groundwater source for the area. The alluvium is recharged through surface infiltration from rainfall and runoff from adjacent areas, as well as from the river during high river stages. Some recharge may also be received from surrounding and underlying bedrock. In general, the direction of groundwater flow in the alluvial system is toward the river, often with a strong downstream component. However, flow direction may be affected by river stage.

Public Drinking Water Advisory:

Alluvial groundwater in the immediate vicinity is potentially usable as a drinking water supply, but no current usage is nearer than the alluvial wells located four miles downstream serving the city of Independence. The nearest public water system surface water intake is at Lexington which is 37 miles downstream. This site may affect the water quality of the Missouri River but poses little direct threat to downstream public water systems.

Health Assessment:

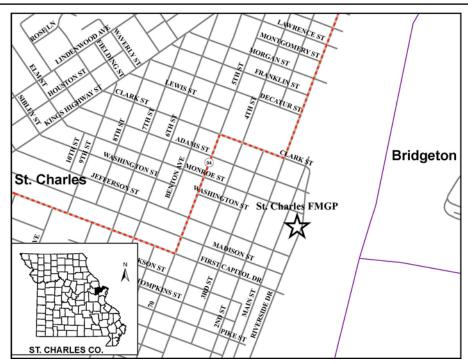
The Riverfront Landfill in Kansas City, Jackson County, Missouri, contains a wide variety of hazardous wastes. The site was operated as a municipal landfill from 1950 until 1972. No attempt was made to regulate the types of waste disposed at the site, nor were any records maintained on wastes dumped at the site. The western portion of the landfill was turned into a city park.

Soil samples taken in 1983, by EPA revealed a wide variety or contaminants. Soil samples taken later by the Kansas City Health Department showed lead levels from 49 to 8,000 parts per million. The following are the major contaminants of concern: benzene, beryllium, bromodichloromethane. chlorobenzene, chloroform, chromium, 1,2dichlorobenzene, 1,3-dichlorobenzene, 1,4dichlorobenzene, 1,1-dichloroethane, 1,2dichloroethene, ethylbenzene, lead, mercury, selenium, 1,1,2,2-tetrachloroethane, toluene, 1,1,2-trichloroethane, trichloroethylene, and vinyl chloride. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

It is difficult to assess the exposure that people using the park would have incurred. People who engaged in soil disturbing

activities such as riding three wheelers, digging fishing worms, or who frequented areas where vegetative cover was lacking would probably have received the highest exposures, but the significance of these exposures is unknown.

The presence of a boat access ramp to the Missouri River on the site could expose individuals and maintenance workers for short periods if they disturb the soil. Previously noted signs of trespassing, such as dumping of rubbish, have been eliminated due to the addition of a mobile security force, new locking gates, and concrete barriers.



Site Name: St. Charles FMGP

Classification: Class 3

Date of Registry Placement: December 8,

2000

<u>Site Address:</u> Intersection of North Riverside Drive and Monroe Street, St. Charles, St. Charles County, Missouri

Present Property Owner: City of St. Charles

Lead Agency: DNR

<u>Waste Type</u>: Coal tar, which contains volatile organic compounds (VOCs) and semi-volatile organic compounds, including polycyclic aromatic hydrocarbons (PAHs)

Quantity: Not determined

Site Description:

The site, located in St. Charles' downtown historic district, is covered by an asphalt parking lot with no visual remains of the former manufactured gas plant (FMGP) structures. The FMGP structures associated with the St. Charles Gas Works, later called the St. Charles Gas Co. and the St. Charles

Lighting Co., appear on historic Sanborn maps as early as 1886 to as late as 1929. The structures included a 35,000 cubic foot capacity gas holder, a 50,000 cubic foot capacity gas holder, a purifying room, raiser, retorts, two round underground tar tanks, and two square underground tar tanks. Some structures from the past gas manufacturing facility may be partially intact beneath the site.

The site was identified as part of a comprehensive, statewide effort by the Missouri Department of Natural Resources' (the department) Hazardous Waste Program (HWP) to locate FMGPs in Missouri and to evaluate the potential hazards posed by these sites. A pre-Comprehensive Environmental Response, Compensation and Liability Information System Site Screening (SS) report was completed by the HWP on March 30, 2000. Coal tar, a byproduct of the gas manufacturing process, is the primary waste of concern.

Environmental Problems and Areas of Concern Related to Site:

Subsurface soil samples collected from the approximate former location of the FMGP contained VOCs and carcinogenic PAHs at concentrations exceeding health-based

screening levels. One sample contained leachable benzene that exceeded the Toxicity Characteristic Leaching Procedure regulatory limit of 0.5 parts per million making this sample characteristic hazardous waste based on toxicity. The coal tar remaining in the subsurface may pose human health risks should any type of excavation or accidental uncovering occur in the future.

Remedial Action at the Site:

The SS report concluded that the asphalt parking lot should act as a cap protecting workers and other individuals from potential exposure that may result from subsurface contamination. Further assessment, including the use of additional equipment to penetrate on-site concrete, would compromise the integrity of an apparently effective cap. Such action was not recommended at the time of the SS provided that institutional controls are in place and state oversight of future activities is ensured. Further sampling will be recommended if the parking lot was removed.

General Geologic and Hydrologic Setting:

The site lies on a west slope along the Missouri River at the edge of the 100-year flood plain. Where not excavated or covered with fill, about 10 feet of silty, sandy loam with moderate permeability lie beneath the site.

Groundwater within the surficial materials recharges the Missouri River to the east. Precipitation has little chance of infiltrating the unconsolidated materials due to pavement and structures that cover the ground surface. Therefore, most water within the residuum originates from the Mississippian-age limestone hills to the west.

The Mississippian-age, finely-crystalline, 85-foot-thick St. Louis Limestone bedrock lies less than 10 feet deep. This limestone formation exhibits secondary dissolution features that add to its permeability. Deeper strata include the 115-foot-thick, coarsely-crystalline Salem Limestone and the 115-foot-thick, fossiliferous limestone of the Warsaw Formation.

The deep bedrock aquifer is used in the local hills as a water source. However, due to the proximity of the site to the Missouri River, to which the aquifer discharges, the deep aquifer is not threatened.

Public Drinking Water Advisory:

The city of St. Charles' well field is 3.5 miles away in the Mississippi River alluvium. A St. Louis County river intake is located 7.5 miles downstream on the Missouri River. No other public drinking water sources are nearby. No effect on public drinking water is expected from this site.

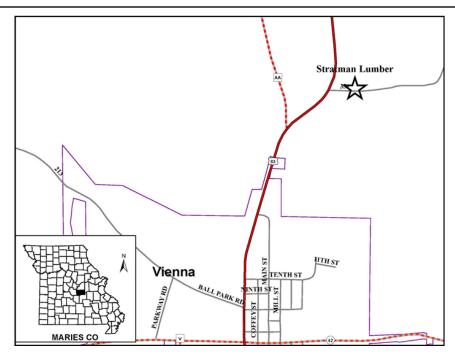
Health Assessment:

Benzene is a central nervous system depressant and a known human carcinogen. Short-term exposure can result in dizziness, slurred speech, and other symptoms characteristic of depressants. Inhalation can result in irritation of the respiratory tract and pulmonary edema. Longer-term exposure can damage the heart and liver and can cause leukemia.

Currently, little opportunity for human exposure exists because the site is newly covered by an asphalt parking lot. However, if the site is disturbed, site workers and nearby residents may be exposed to harmful levels of contaminants within subsurface soils through ingestion, dermal absorption, or inhalation of dust and vapors.

Based on available information, a health threat does not currently exist at the St. Charles FMGP Site. It is not known whether any groundwater is impacted, but no groundwater targets have been identified.

Stratman Lumber



Site Name: Stratman Lumber

Classification: Class 3

Date of Registry Placement: November 22,

2000

<u>Site Address:</u> 0.1 miles east of the intersection of U.S. Highway 63 and County Road 331, north of Vienna, Maries County, Missouri.

Present Property Owner: Mickey Jones

Lead Agency: EPA

Waste Type: Pentachlorophenol (PCP)

Quantity: Not determined

Site Description:

The Stratman Lumber Site is located in a rural area just north of Vienna. Mid-Mo Post and Lumber, Inc. (known locally as Stratman Lumber), was a wood treating facility that operated at the site from 1967 until 1979. The entire wood treating facility was originally 8 acres.

The company purchased, treated and sold wood posts and lumber of hardwood and

softwood species. The wood treating operation was a vacuum system consisting of three tanks connected by piping: a treatment tank where the wood was placed, a storage tank for the PCP, and an oil/water/impurity separator. Sometime in the 1960s, vandals reportedly trespassed on site and loosened bolts on the wood treating cylinder, allowing PCP to spill onto the ground.

A subsequent owner dismantled and moved the wood treating tanks, established a sawmill operation, built an office, and fenced off the property. The sawmill operated for approximately one year with about five workers. The sawmill operation ceased in 1995 due to the potential risk to workers from the historical contamination.

Environmental Problems and Areas of Concern Related to Site:

PCP from wood treating processes is present at concentrations above health-based screening levels in subsurface soil. PCP wood treatment residuals are listed as U.S. Environmental Protection Agency (EPA) hazardous waste F032. The EPA designates PCP as a hazardous substance, hazardous waste, and priority toxic pollutant.

Surface water has been impacted by the site.

Two documented fish kills have occurred as a result of runoff from the site. Because of the removal of highly contaminated soil, further environmental impacts from this pathway would not be expected.

Remedial Action at the Site:

In 1997, the Missouri Department of Natural Resources (the department) conducted a Removal Site Evaluation to determine the extent of PCP contaminated soil. Analytical results from soil samples documented that an area of 4,440 square feet was contaminated with PCP to a depth of three feet (493 square yards).

In 1999, Ecology & Environment, Inc. (E&E) was tasked by the EPA to determine the extent of PCP contamination and assist in the subsequent removal action. On July 16, 1999, E&E delineated 110, 14 by 14 foot cells around the contaminated area. The EPA established 220 parts per million (ppm) PCP as the site action level. Results from sampling events in July 1999, and previous department sampling results identified 19 cells suspected of exceeding the removal action level of 220 ppm. PCP was detected at concentrations up to 5,920 ppm.

Starting in November 1999, 19 cells were excavated to depths of contamination determined from previous sampling. Following excavation activities, further analytical data identified PCP contamination above the site action level in 11 cells. These cells were further excavated until sampling confirmed that PCP contamination levels were below the 220 ppm site action level. The excavated cells were then back filled with clean soil. The removal action was completed December 6, 1999. All known areas of PCP soil contamination exceeding the 220 ppm site action level were addressed by this removal action. However, soil containing PCP with concentrations exceeding residential healthbased screening levels remains on-site.

General Geologic and Hydrologic Setting:

The site is located within the Salem Plateau, part of the Ozark Plateau of the Interior Highlands Physiographic Province. It is situated on a ridge near the divide between

the Maries and Gasconade Rivers. The site encompasses the divide between two small tributaries to the Gasconade River. The southern part is within the Indian Creek drainage. The northern part drains toward Crumb Creek. The site is located about 1.9 miles west of and 285 feet higher in elevation than the Gasconade River.

The site is underlain by the Jefferson City Dolomite, a medium to finely crystalline dolomite. The lithology is variable and includes thin beds of clayey dolomite, brecciated chert, shale and occasionally sandstone. The Jefferson City Dolomite is covered by less than 10 feet of surficial materials, consisting of very little soil present over the thin cherty residuum. The bedrock below the site is not karst.

The Ordovician-age Jefferson City Dolomite is part of the Ozark Aquifer, which is the principal aquifer of the Salem Plateau region. In addition to the Jefferson City Dolomite, the Ozark Aquifer is composed of the Ordovicianage Roubidoux Formation and Gasconade Dolomite and the Cambrian-age Eminence Dolomite and Potosi Dolomite. The total thickness of the Ozark Aquifer at this site is expected to be 1,000 feet.

Residential wells obtain water from the Ordovician-age formations and the city of Vienna public drinking water well extends into the Potosi Dolomite. The depth to the regional water table is expected to be in the range of 100 to 150 feet below the ground surface. The direction of groundwater flow is unknown. Because of the low vertical permeability of the Jefferson City Dolomite, perched water may be encountered at the top of unweathered bedrock. The Ozark Aquifer is probably not at significant risk of contamination from the site.

Public Drinking Water Advisory:

Wells serving the city of Vienna are about three-quarters of a mile south of this site. This puts Vienna's wells at a moderate risk of contamination. The Public Drinking Water Program has increased monitoring to a quarterly schedule for volatile organic compounds in Vienna's wells.

Tetrachloroethene has been detected in Well No. 3 but that detection is probably not related to the Stratman site and no imminent danger is expected.

Health Assessment:

PCP is the major contaminant of concern found in soils. The PCP used to treat lumber at the site may have been technical grade PCP. Technical grade PCP routinely contained contaminants including tri- and tetrachlorophenol, hexachlorobenzene, polychlorinated dibenzo-p-dioxins, and polychlorinated dibenzofurans. Due to the presence of contaminants, the toxicity of PCP is difficult to assess. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with PCP.

The health concerns involve exposure to contaminated soil, surface water and groundwater. PCP remains in soil at concentrations up to 220 ppm. While this value is protective of the casual trespasser, it is not protective enough to allow residential development and is marginal for industrial use. Leaching of PCP to groundwater may also occur.

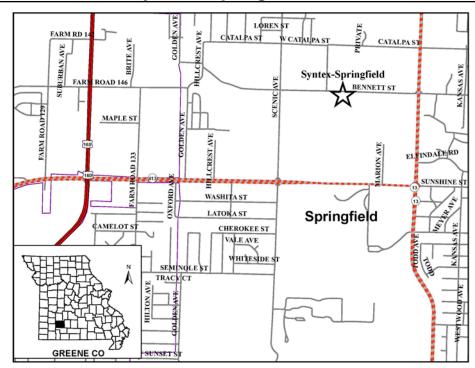
In 1994, both the department and the Missouri Department of Health and Senior Services (DHSS) sampled private wells in the vicinity for metals and organic compounds. Both copper and zinc were detected during the sampling event. The presence of copper was attributed to background sources while zinc was site-related. The detected levels of metals were below unsafe levels for drinking water. No PCP was found in any of the samples. DHSS does not routinely sample the private wells in the vicinity of the site.

A site inspection by the department was conducted in March 2007. According to the site inspection report, a business exists in the building previously erected adjacent to the site. DHSS is concerned that visitors and workers may be exposed to site-related contaminants. Potential exposure may arise from direct contact with residual contamination

in surface soils and dust. Exposure from pathways including volatilization of PCP to indoor air and ambient air are not expected to be significant because of the site remediation, the potential for breakdown of PCP in surface soils, and the limited volatility of PCP. Unless excavation of deeper soils occurs, visitors and workers should not be exposed to subsurface soil contamination.

In 2008, DHSS sampled two private water supplies adjacent to the site for PCP. PCP was not detected in either well. One private water supply remains on site, but was not sampled. A non-community public water supply serving the shooting range on County Road 331 also was not sampled. According to one landowner, a spring is located within one mile northeast of the site.

Based on available information, the contaminants at the Stratman Lumber Site present a potential health threat to the general public. The fact that PCP remains in soil presents a potential on-site risk due to direct exposure to soils and an off-site risk due to migration of contaminants in groundwater. DHSS therefore recommends that contact with the contaminated soils by workers and visitors to the commercial property be infrequent, and restricted only to non-invasive activities. Prior to further development of the site, additional soil testing should be performed. Results of the analyses should be compared to current risk-based action levels to determine if exposure to soils presents a risk to human health. Follow-up sampling of water supplies and spring in the area is recommended to reassess off-site migration and exposure to contaminants.



Site Name: Syntex - Springfield

Classification: Class 3

Date of Registry Placement: January 1,

1984

<u>Site Address</u>: 2460 West Bennett Street, Springfield, Greene County, Missouri NW 1/4, SW 1/4, NE 1/4, SW 1/4, Sec. 27, T. 29N, R. 22W, Springfield Quadrangle

Present Property Owner: Euticals Inc.

Lead Agency: DNR

<u>Waste Type</u>: Volatile organic compounds, semi-volatile organic compounds and 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

This site is an active chemical manufacturing facility. Currently, the site is fenced with 24-hour security. Hazardous wastes generated by past plant processes were managed in a surface impoundment at the facility. The impoundment was operated from the late 1950s until the early 1970s, as a settling pond in conjunction with on-site wastewater

treatment. The impoundment was then used for management of hazardous wastes from the early 1970s until 1982 when it was decommissioned.

Partial closure of the southern portion of the impoundment was completed in 1975, by filling it with native soil, rock and concrete. An interim hazardous waste concrete storage pad was then constructed on top of the closed portion. The remainder of the impoundment was physically closed in 1985, under a Closure Plan approved by the Missouri Department of Natural Resources (the department).

Environmental Problems and Areas of Concern Related to Site:

The primary environmental problems are hazardous wastes and constituents that were released from the former surface impoundment. The vertical and horizontal extent of soil and groundwater contamination has been determined.

The aqueous phase liquid (APL) plume volume is unknown. The horizontal and vertical extent of the APL plume generally parallels the dense non-aqueous phase liquid (DNAPL) plume.

The site is located at the confluence of Fassnight, Jordan and Wilson Creeks, which gives it high priority because of the extent of contamination and potential threat to public health and the environment.

Jordan Creek runs along the eastern edge of the site joining Fassnight Creek at the southern site boundary to form Wilson Creek. The department sampled water from Wilson Creek and area drinking water wells. Results of these analyses showed no contamination attributable to releases at the facility. In addition, Euticals, Inc. (Euticals) has sampled Wilson, Jordan and Fassnight creeks in recent years and found no contamination attributable to releases at the facility.

Remedial Actions at Site:

In September 1983, Syntex alerted the department and the U.S. Environmental Protection Agency (EPA) that various site investigation and groundwater monitoring activities confirmed the release of hazardous wastes to soil and groundwater from the surface impoundment. On September 14, 1983, the department issued an emergency directive to Syntex requiring the company to: (1) immediately install a portable water treatment system; (2) immediately eliminate all discharges of wastewater into the impoundment; (3) immediately install aboveground, lined containment tanks; (4) pump water from the impoundment through the portable water treatment system: and (5) sample the treated water and report the results to the department.

Syntex implemented the emergency directive. Water was removed from the impoundment and treated. After analysis showed the treatment was effective, the treated water was discharged into the Springfield sewer system. A concentrated sludge remained on the bottom of the lagoon.

On September 20, 1983, the department issued an order to Syntex requiring the company to submit to the department and the EPA a closure plan for the surface impoundment and a remedial action plan for cleanup of contamination in the alluvium and groundwater. The order also required installation of new monitoring wells at the

facility to better determine the extent of contamination. Following the department's review, the closure and remedial action plans were approved on July 6, 1984.

Syntex initiated steps to close the surface impoundment by treating contaminated water, stabilizing and excavating contaminated sludge, and placing the contaminated solids in a large reinforced concrete storage area permitted under the Resource Conservation and Recovery Act (RCRA). In 1988, the stored solids were removed from the storage tank and incinerated at the Denney Farm Site. Following the initial stabilization and removal of contaminated soil and sludge, verification sampling was performed to ensure adequate solids removal; a french drain was installed in the floor area of the impoundment; and the remainder of the impoundment was filled with clean, compacted clay and capped with gravel. In February 1986, the department indicated that filling the impoundment and putting a liner over the top of the impoundment did not constitute a final closure, nor did it represent a completion of all remediation that may be necessary due to the hazardous constituents left in place. Therefore, clean closure was not granted at that time. In 1989, a concrete cap was added over the area of the former impoundment.

Syntex operated under a departmentapproved post-closure plan due to the hazardous waste constituents left in place. The plan required continued groundwater monitoring for previous releases from the former impoundment. In addition, Syntex addressed further investigation, monitoring and remediation of groundwater and soil contamination at the facility under the terms of a RCRA Corrective Action Order on Consent. This Order was negotiated between Syntex and the EPA. Syntex completed a RCRA Facility Investigation (RFI) work plan that was approved by the EPA and the department. The scope of the RFI included the following: (1) characterize the potential pathways of contaminant migration; (2) characterize the source(s) of contamination; (3) define the degree and extent of contamination; (4) identify actual or potential receptors; and (5) support and develop or refine the corrective measures.

The RFI was completed in June 1996. The EPA approved the final report in July 1996. The Corrective Measures Study (CMS) was initiated in late 1996, and a final CMS Report was submitted to the department and EPA in January 2002, identifying and evaluating potential remedial alternatives. The department and the EPA approved the final report in March 2005. Syntex's RFI demonstrated that contaminated groundwater is captured by pumping wells, and contamination is confined within the facility property boundary. RFI evaluations by the department's Geological Survey and Resource Assessment Division, showed no detection of water from the contaminated area of the plant in the on- or off-site creeks or in area springs. Euticals sampled Wilson, Jordan and Fassnight creeks in 2005, 2006, 2008, 2011, and 2012, and found no contamination attributable to releases at the facility. As part of the final remedy, Euticals is required to periodically sample the nearby creeks.

Euticals has an ongoing groundwater extraction and treatment system in place. Contaminated groundwater is recovered via six extraction wells and the french drain. Euticals received approval from the city of Springfield in November 2003, to modify their on-site treatment system. The groundwater is now treated in Euticals' water treatment plant which consists of phase separators, a holding tank, a cartridge filter, and an air stripper. The treated water is then stored in holding tanks, tested and released to Springfield city sewers.

There are currently 60 groundwater monitoring wells at Euticals and a french drain. 13 wells monitor the alluvial (A) zone at 0-25 feet below ground surface (fbgs), 15 wells monitor the weathered, karstic portion of the upper Burlington zone (WB1) at 25-80 fbgs, and three wells monitor the contact between the A and WB1 zones. In addition, seven wells monitor the upper Burlington formation (UB1) at 50-80 fbgs, five monitor the middle Burlington formation (B2) at 140-155 fbgs, and seven monitor the contact between the UB1 and B2 zones. Five wells monitor the lower Burlington and Upper Elsey (E) zones at 200-220 fbgs, and five wells monitor the Pierson (P) zone wells at 260-280 fbgs.

Twenty-four of these wells are currently sampled for groundwater contaminants including five A zone wells, 10 B1 zone wells, six B2 zone wells, one E zone well, and two P zone wells. There are currently six recovery wells and a french drain to pump groundwater. Twenty-five wells have been closed on-site. The weathered, karstic portion of the upper Burlington Formation is the predominant pathway for aqueous phase liquid (APL) plume movement.

The department and EPA issued a Final Remedy Decision on September 30, 2010. The department and EPA also issued final hazardous waste permits to Euticals on September 30, 2010. The department issued the final Missouri Hazardous Waste Management Facility Part I Permit. EPA issued the draft Hazardous and Solid Waste Amendments Part II Permit. The hazardous waste permits require Euticals to conduct corrective action activities, including groundwater monitoring and containment, to ensure that the contaminant plume does not pose a threat to human health or the environment. The final hazardous waste permits outline the final remedy, which includes enhanced institutional controls. dense non-aqueous phase liquid (DNAPL) recovery, surface water monitoring of creeks, groundwater containment and monitoring, and continues monitoring and maintenance of the closed, capped former surface impoundment. As part of final remedy implementation, Euticals installed three DNAPL recovery wells in August 2012. The final permits also outline the options that will be pursued in the event that the contaminated groundwater poses a threat due to significant off site or vertical movement. The department is the lead agency for corrective action through a corrective action transition plan with the EPA.

General Geologic and Hydrologic Setting:

The site is located on the flood plain of Jordan Creek near its junction with Fassnight Creek. The unconsolidated surficial materials at the site consist of five to 16 feet of fill material composed of silty, gravelly clay with minor amounts of sand. The fill is underlain by 0.5 to 20 feet of silty clay alluvium containing interspersed sand and gravel zones.

Permeability of the alluvium varies based upon composition, with highest permeability in the sand and gravel zones.

Groundwater generally occurs at eight to 15 fbgs within the fill and alluvium. The direction of groundwater flow within the alluvium is generally toward Jordan Creek. Fassnight and Jordan Creeks, which become Wilson Creek at their confluence, appear to be gaining streams in the vicinity of the site.

Bedrock immediately underlying the alluvium is the Mississippian-age Burlington-Keokuk Limestone. The cherty limestone extends to a depth of approximately 280 feet to the top of the Northview Formation. Regionally, the Northview Formation is considered to be a confining layer that separates the shallow Mississippian-age limestones from the deeper Ordovician-age dolomites and sandstones.

Monitoring wells were installed in several different horizons within the alluvium and limestone bedrock. Water level information from these wells indicates a good hydraulic connection between the alluvial sediments and the upper shallow bedrock. Water levels in wells installed in deeper horizons of the shallow bedrock aquifer indicate a poor or very poor connection. These wells have significantly lower water levels and very low yields. These facts, together with the pumping test data, suggest that low-permeability zones exist in the lower part of the shallow bedrock.

Both the alluvium and the shallow bedrock aquifer have been affected by contamination. Because contaminants have been observed in several of the deeper monitoring wells, it can be assumed that downward migration of contaminants has taken place.

Public Drinking Water Advisory:

The nearest public wells serve the U.S. Medical Center 1 mile south of the Syntex-Springfield Site. All public wells in the Springfield area draw water from the deep aquifer. The deep aquifer is naturally isolated from the shallow aquifer by the Northview Formation. It is vital that no open wells or other vertical conduits occur in the vicinity of the Syntex-Springfield Site that would allow

shallow groundwater contamination to reach the deep aquifer. Drilling groundwater wells on the facility property is restricted as Greene County is classified as a sensitive area according to the Missouri Well Construction Code, 10 CSR 23-3.100(3).

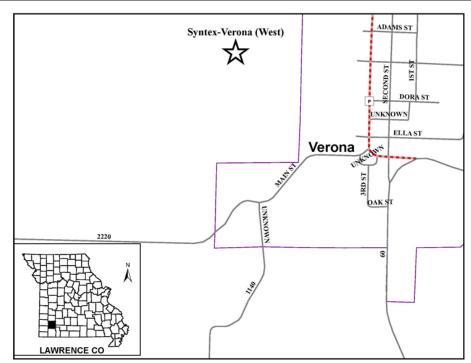
Health Assessment:

The following are the major contaminants of concern found at the site: benzene, chloroform, 1,1-dichloroethane, 1,2-dichloroethane, dioxin (2,3,7,8-TCDD), ethylbenzene, methylene chloride, toluene, trichloroethene, vinyl chloride, and xylenes. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Ingestion and direct contact are the primary routes of exposure since chemicals have leached into groundwater. If chemical fumes are inhaled or if chemical is ingested it can be harmful; however, that has been deemed highly unlikely in this area due to lack of public wells and the chemicals unlikelihood of transportation to area springs. The plume is contained on-site. Drilling groundwater wells on the facility property is restricted as Greene County is classified as a sensitive area according to the Missouri Well Construction Code, 10 CSR 23-3.100(3).

Jordan and Wilson Creeks are the areas that would be most affected by surface and subsurface movement of chemicals off site. Currently, no detectable exposure to hazardous chemicals are occurring from the site, but the possibility exists for future exposure. The site has been capped and covered with a storage building erected over the old lagoon site.

Based on available information, a threat to public health exists.



Site Name: Syntex - Verona (West)

Classification: Class 3

Date of Registry Placement: January 1,

1984

Date of NPL Listing: September 8, 1983

<u>Site Address:</u> First Street, Verona, Lawrence County, Missouri, SW 1/4, NE 1/4, Sec. 17, T. 26N, R. 26W, Verona Quadrangle

Present Property Owner: Syntex

Agribusiness, Inc.

Lead Agency: EPA

Waste Type: 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

The Syntex - Verona (West) Site consists of vacant land west of the Spring River near Verona, Missouri. The Site is part of the larger Syntex Facility Superfund Site listed on the United States Environmental Protection Agency (EPA) National Priorities List. In 2002, at the request of the property owners, the Syntex Facility Superfund Site was divided

into two separate sites for purposes of the Missouri Registry: The Syntex - Verona (West) Site and the Syntex - Verona (East) Site. The Syntex - Verona (East) Site is where Northeastern Pharmaceutical and Chemical Company (NEPACCO) formerly leased a building to manufacture hexachlorophene and produced dioxin as an unwanted byproduct. This property is located east of the Spring River and currently is owned by BCP Ingredients, Inc. (BCP). The Syntex - Verona (West) Site is owned by Syntex Agribusiness. Inc. (Syntex) and is west of the Spring River. The Spring River separates the two sites. For remediation and regulatory purposes, the two properties are still treated as one site.

The Syntex - Verona (West) Site is the subject of this Registry listing and is referred to herein as "the Site." It contains buried waste materials, some of which are contaminated with dioxin. The Site was remediated by Syntex with oversight from the EPA. The soils portion of the Site received a completion letter from EPA in September 1998.

Environmental Problems and Areas of Concern Related to Site:

The main area of concern on the Site is the Trench Area where manufacturing wastes, primarily consisting of non-hazardous solid

wastes, were placed in five trenches eight to 12 feet deep excavated in the soil, and then covered. With the oversight of the EPA, numerous investigations in and around the trenches were conducted to delineate the nature and extent of chemicals of concern. Dioxin exceeding 20 parts per billion (ppb) in soil remains buried on the Site. EPA's 2012 Fourth Five-Year Review Report recommended additional investigations be conducted to further evaluate the protectiveness of the current remedy as implemented for the Trench Area.

Remedial Actions at Site:

The Trench Area was remediated by constructing a clay cap to promote drainage away from the trenches. Topsoil was subsequently placed on the cap, and vegetative cover was established and is being maintained. In addition, Syntex installed an upgradient gravel trench to divert storm water away from the trenches. Syntex installed seven groundwater monitoring wells to monitor groundwater quality at the Trench Area. In July 1996, Syntex abandoned some of the trench groundwater monitoring wells, and subsequently installed four new wells to sample shallow groundwater.

Syntex sold an uncontaminated 80-acre tract west of the trenches. The company retained the required buffer area and established permanent survey markers around the Site as required by Registry law.

Syntex installed and is operating a monitoring system downgradient of the Trench Area to monitor shallow groundwater as required by the Record of Decision (ROD) for soils. Thus far, low levels of volatile organic compounds have been detected, as have low levels of dioxin that are believed to be the result of cross-contamination. Contaminants are not known to be leaving the Site.

A Fourth Five-Year Review, completed in September 2012, noted that based on available data, protectiveness of the remedies for soil and groundwater could not be determined. It was recommended that the entire site, including both soil and groundwater, be reevaluated using currently accepted risk levels. Additional investigation is

recommended, with a milestone date of September 2014. An addendum to the Fourth Five-Year Review is anticipated from EPA by September 2015.

General Geologic and Hydrologic Setting:

The Site is located in an upland area not subject to flooding by the Spring River. Soil beneath the Trench Area and in the surrounding upland area consists of cherty silt and clay that overlies bedrock and ranges from about 40 to 60 feet thick. Shallow groundwater occurs at or near the soil/bedrock interface, approximately 30 feet below the bottom of the trenches.

Two bedrock aquifers are present at the Site: the shallow Mississippian limestone aquifer called the Springfield Plateau Aquifer and a deeper aquifer made up of Cambrian- and Ordovician-age carbonates and sandstones called the Ozark Aquifer.

The Springfield Plateau Aquifer is made up of cherty limestones that directly underlie the surficial materials. This aquifer supplies limited yields to shallow wells used mostly by individual landowners in the general area. The Mississippian aquifer is subject to contamination from local sources, such as septic tanks and agricultural runoff, either through permeable soil and bedrock or through poorly-cased wells.

The Ozark Aquifer, present typically at depths greater than 300 to 400 feet, is used to supply major industrial and municipal users in the area. In general, the Ozark Aquifer in this region of the state has not been affected greatly by surface contamination; however, some localized pollution has resulted because of poorly-cased deep wells penetrating both the upper and lower aquifers.

Public Drinking Water Advisory:

Syntex purchased the former Well No. 3 of the Aurora-Verona water system located at the northeast corner of the Verona (East) Site, which is now used only for fire protection by BCP. The nearest existing public well is two miles east of the Site. This is Well No. 4 of the Aurora-Verona water system. This well is cased to a depth of 421 feet and draws water

from the Eminence Dolomite, which is part of the deeper Ozark Aquifer. Well No. 3 was sampled and no dioxin or other organic chemicals were found.

Health Assessment:

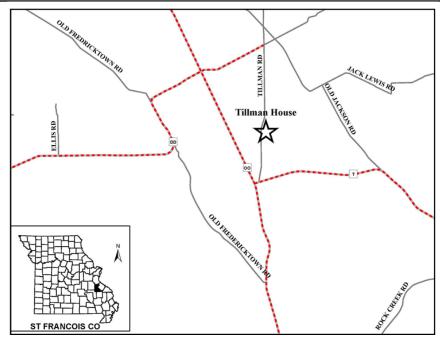
Dioxin is one of the most toxic substances known; however, its toxicity varies greatly among species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is suspected to cause soft tissue sarcomas, Hodgkin's disease, non-Hodgkin's Lymphoma, and porphyria cutanea tarda.

Potential routes of exposure include ingestion of contaminated water, direct exposure to the contaminated soil, or inhalation of contaminated dust. Overland access to the Trench Area is possible, but property boundaries are fenced and posted "No Trespassing - Restricted Area." The outline of the Trench Area cap is marked and posted. Access along the Spring River is limited by heavy vegetation. Waste materials are capped by two feet of soil and are not exposed. Shallow groundwater at the Site is not accessible. Fish in the Spring River are considered safe to eat because sampling has shown that dioxin levels are below levels of health concern.

It cannot be determined based on available information whether a threat to the public health exists. Remedial activities were implemented to mitigate potential Site risks and were approved by EPA. However, EPA's 2012 reassessment of dioxin toxicity has indicated the need to reevaluate Site conditions to determine whether the previously implemented remedy remains protective.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Tillman House



Site Name: Tillman House

Classification: Class 3

<u>Date of Registry Placement</u>: September 24,

2001

<u>Site Address</u>: Tillman Road near Highway OO and T about nine miles south of Farmington, St. Francois County, Missouri

Present Property Owner: Lindell and Lola

Clubb

Lead Agency: DNR

Waste Type: Volatile organic compounds

(VOCs)

Quantity: Not determined

Site Description:

The site is the location of the former North American Airborne Allergens, Inc. (NAAA), which used tetrachloroethylene (PCE) and acetone in the processing of pollens for pharmaceutical use from 1975 until 1989. During operations, PCE and acetone were burned with trash and were spilled on site.

The site occupies 15 acres in a rural area. An

unnamed intermittent stream flows through the center of the property and enters the Little St. Francis River at the northwest corner. The site is used as a residence with several structures including the historic Tillman House, a foundation from the former Weidert house, a barn, and a mobile home. The Clubb's bought the property from Mrs. Weidert in May 1995. Liddell Clubb and his wife reside in the Old Tillman House on the north side and his son Mike and his family live in a trailer on the south side closest to the former Weidert home.

Environmental Problems and Areas of Concern Related to Site:

Soil, ground- and surface water were contaminated with PCE. The spilled PCE, designated as an EPA hazardous waste U210, was detected in ground- and surface water at concentrations up to 1,640 parts per billion (ppb). Trichloroethylene (TCE) is present in groundwater at concentrations up to 81.9 ppb.

It was recommended that the old contaminated Weidert well be properly closed and abandoned. It was concluded that this would cut off the route of exposure to contaminated drinking water and most likely eliminate a contaminant pathway to deeper

groundwater. The Weidert well was properly closed and abandoned in August of 2011. The department's Wellhead Protection Program oversaw this action.

Potential exposure to contaminated water in the stream remains a concern; one surface water sample documented PCE at 774 ppb and TCE at 9.6 ppb.

Remedial Action at the Site:

A 1996 combined Preliminary Assessment/ Site Inspection (PA/SI) investigation by an EPA contractor recommended a removal action due to the presence of PCE and TCE in the on-site private drinking water well. PCE was also detected in soil samples. Therefore, the EPA installed a carbon filtration system for the drinking water well.

This well was constructed in 1941 according to the current property owner, Mr. Lindell Clubb. This well was approximately 200 feet deep and only cased 10 feet down.

In 1998, Mr. Lindell Clubb had a new well drilled to serve his home (the Old Tillman Historic house). It was drilled to a total depth of 307 feet and had 80 feet of casing. This well was tested and continues to be tested by Department of Health and Senior Services (DHSS) and has never had a detection of any VOCs.

The Department conducted a Site Reassessment (SR) investigation in 1999 because the carbon filtration system on the original Weidert well was found not to be effective in removing the TCE to levels below the MCL. It was determined this was due to the fact that the filter had never been changed or replaced. Surface water in the pool of the on-site intermittent stream and at the confluence of the intermittent stream and the Little St. Francis River was sampled during this investigation. The surface water was found to contain PCE above the maximum contaminant level (MCL) and Missouri Water Quality Standards benchmarks. However concentrations decreased to below levels of concern approximately 250 feet downstream of the confluence with the Little St. Francis River.

Starting in the spring of 2004, DHSS sampled private wells in the nearby vicinity and have not found any of them to be impacted.

In October of 2005, Lindell Clubb had another well drilled on the southern part of the property for his son Michael. It was drilled to 287 feet and had 80 feet of casing. It is located approximately 300 feet west of the old Weidert well. This new well has been tested five times by DHSS starting in 2006. The sampling documentation is included. In November 2006, PCE was detected at 4.8 ppb and then it was sampled again in April of 2007, and PCE was detected at 1.2 ppb. It was again tested in May 2008, August of 2009 and in Nov 2011, and had no VOCs detections.

General Geologic and Hydrologic Setting:

The site, located on the eastern fringe of the Salem Plateau portion of the Ozark Plateau physiographic province, is situated on a gently rolling surface. An intermittent creek crosses the site from the east to the northwest where it enters the Little St. Francis River immediately.

The site is underlain by the Cambrian-age Bonneterre Formation which is composed of dolomite, characterized by a pinnacled erosional surface, and overlain by about 10 feet of silt and silty clay (loess) and clayey materials. Examples of minor karst, such as losing streams, seeps and springs, have been reported near the site. Large joints (bedrock fractures) observed in bedrock exposed in the Little St. Francis River may be related to underlying geologic structures (Libertyville Graben) and more distant northwest/ southeast trending fault zones.

The Cambrian-age Bonneterre Formation and the underlying Lamotte Sandstone form the St. Francois Aquifer. In areas like the eastern part of the Ozark province, adjacent to the east side of the St. Francois Mountains groundwater province (also the recharge area for the St. Francois Aquifer), the St. Francois Aquifer is the only local source of groundwater available and therefore important. The water table likely is about 10 feet below the ground surface near the contact between soil and bedrock. The direction of groundwater flow may be controlled by joints but likely is

generally toward the northwest with discharge occurring to the Little St. Francis River.

The intermittent creek, which crosses the site, enters the westward flowing Little St. Francis River. The Little St. Francis River continues to flow to the west then turns south where it joins the St. Francis River. The St. Francis River eventually empties into the Mississippi River in eastern Arkansas.

Public Drinking Water Advisory:

No public water supplies are affected by this site. The nearest public well formerly served the Libertyville Elementary School 1 mile to the north. This well has not served as an active public source since 1994.

Health Assessment:

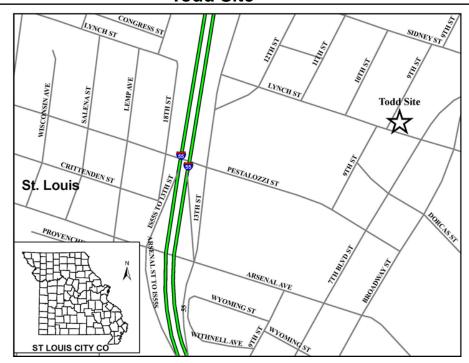
PCE is a central nervous system depressant that is a known animal and suspected human carcinogen. Acetone can irritate the eyes, nose, and throat and cause headache and dizziness. Other contaminates found at the site include trichloroethene and 1,2-dichoroethene. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Ingestion, inhalation, and dermal contact with PCE and its degradation products through contaminated groundwater are the major exposure routes of concern. In October 2005. the owner drilled a new well on the southern part of the property. It was drilled to 287 feet and had 80 feet of casing. It is located approximately 300 feet west of the old Weidert well. This new well has been tested five times by DHSS starting in 2006. The sampling documentation is included. In Nov 2006 PCE was detected at 4.8 ppb and then it was sampled again in April of 2007, and PCE was detected at 1.2 ppb. It was again tested in May 2008, August of 2009, and in Nov 2011, and had no VOCs detections. DHSS sampled this private drinking water supply and others

on and off site in December, 2012. All results were non-detect for volatile organic chemicals.

Based on available information, only the surface water could be a source of exposure to the contamination. The last sampling of the creek was completed in 1999. Until new sampling of the creek can be completed, it is unknown if the creek is still contaminated.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: Todd Site

Classification: Class 3

Date of Registry Placement: June 2, 1987

<u>Site Address:</u> North side of Lynch Street between 7th and 9th Streets, St. Louis, Missouri

<u>Present Property Owner</u>: Anheuser-Busch Companies, Inc.

Lead Agency: DNR

Waste Type: Stoddard solvent

Quantity: A total of 26 underground tanks and eight 55-gallon drums, containing 54,405 gallons of liquids and sludges and 4,236 cubic yards of contaminated soil, were removed from the site during remediation.

Site Description:

The site is located in downtown St. Louis. A commercial laundry and dry-cleaning business operated on the site until 1980. Stoddard solvent used in that business was stored in underground tanks. Anheuser-Busch Companies Inc., purchased the property in

1980 and, in 1983, razed the buildings and paved the site for use as a parking lot.

Environmental Problems and Areas of Concern Related to Site:

Following remedial actions, residual contamination remains in the soil and groundwater. Contamination may be migrating off site via groundwater. Groundwater locally is not used for drinking.

Remedial Actions at Site:

Sampling and analyses of the underground tanks indicated the presence of Stoddard solvent, which possesses the characteristic of an ignitable hazardous waste. On October 7, 1983, five groundwater monitoring wells were installed. Analyses of groundwater samples collected from these wells showed the presence of Stoddard solvent downgradient from tanks at the west side of the site. This contaminant was not detected in groundwater samples collected upgradient from those tanks. On February 6, 1984, the Missouri Department of Natural Resources (the department) notified Anheuser-Busch of its intention to include the Todd Site on the Registry. On March 2, 1984, Anheuser-Busch appealed the proposed Registry action.

On May 25, 1984, the department issued a "Notice of Order to Clean Up Hazardous Substance" (Order No. HC84-003) to Anheuser-Busch to implement a department-approved Remedial Action Plan (RAP). Implementation of the RAP occurred during August and September 1984. The RAP addressed three areas of the Todd Site.

Eighteen tanks and contaminated soil around these tanks were excavated from the west side (area 1) of the site. Two tanks were found to contain diesel oils and sludges, while the remaining tanks contained Stoddard solvent, sludge or contaminated soil. The liquid wastes contained in the eighteen tanks were shipped to an off-site hazardous waste landfill for solidification and land disposal. The tanks and 4,236 cubic yards of contaminated soil were shipped off site for landfilling. Soil sample results from the excavated pit ranged between 20 and 11,000 parts per million (ppm) for Stoddard solvent. The excavation was filled with clean soil.

The Todd building area (area 2), located at the corner of Lynch and 7th Streets, contained seven underground tanks. The liquid contents of these tanks (essentially Stoddard solvent) were shipped off site for recycling. Sludge contained in the tanks was shipped to an off-site hazardous waste landfill for disposal. Five of the empty tanks were cleaned and filled with grout, while two tanks were excavated and shipped to a landfill.

The dry-cleaning area (area 3), immediately north of the Todd building, consisted of a sump containing gravel, solvents and water, and a large tank containing solvents and water. The tank was pumped out, cleaned and filled with sand. The solvents from the sump and tank were shipped off site for recycling, while the sludges were sent off site for disposal in a hazardous waste landfill. Eight 55-gallon drums of dry-cleaning sludges were also shipped off site for landfill disposal. Following these actions, samples collected from the five monitoring wells showed the presence of Stoddard solvent in downgradient wells at concentrations of up to 32.3 ppm. The recommended water cleanup level was 2.3 ppm. In addition, sample analyses confirmed the presence of a top layer of Stoddard solvent in a third monitoring well. A

sample collected from this well on December 10, 1984, contained a layer of Stoddard solvent with a 1,3,5-trimethylbenzene concentration of 10,000 ppm.

The five monitoring wells were sealed during construction of the parking lot on the west side. Two new groundwater monitoring wells were installed subsequently.

General Geologic and Hydrologic Setting:

The site is located on a moderate slope, which forms the western edge of the Mississippi River alluvial plain. The site is covered by fill material consisting of firm, brown, silty clay, intermixed with construction rubble. The fill, which is generally between 3.5 and 4.5 feet thick, is underlain by silty clay.

The bedrock unit beneath the site is Mississippian-age St. Louis Limestone, a medium- to massively- bedded, fine-grained limestone that is greater than 100 feet thick. The St. Louis Limestone contains welldeveloped karst features. Solutioning of fractures and bedding planes has rendered the bedrock highly permeable. Beneath the St. Louis Limestone is more than 700 feet of Mississippian, Silurian, and Devonian bedrock, predominantly limestone, which forms the uppermost bedrock aguifer. The Ordovician-age Maquoketa Shale separates the upper, freshwater aquifer from the saline water of deeper Ordovician and Cambrian formations.

Shallow soil-exploration borings drilled on the site indicate some free water at about 15 feet below the surface. This water is thought to be perched on top of one of the moderate- to low-permeability, silty, clay deposits. The direction of movement of the perched water is unknown.

The water table elevation at the site is also unknown, but is estimated to be 40 to 50 feet below the ground surface. The general direction of shallow groundwater movement is expected to be eastwardly towards the Mississippi River, which serves as a regional discharge point. The rate of groundwater movement should be slow to moderate in the soil horizons and rapid in the bedrock.

Groundwater is not used generally as a water supply source in St. Louis because surface water supplies have been well-developed. However, wells have been drilled in the downtown area, and some of these may still be in use.

Public Drinking Water Advisory:

The area is served by the St. Louis City Water Department which uses the Missouri and Mississippi Rivers as sources. The water intake on the Mississippi River is located upstream of the Todd Site. The site poses little threat to the public water supply.

Health Assessment:

The chemical composition of a typical Stoddard solvent is 30 to 50 percent paraffins, 30 to 40 percent cycloparaffins, and 10 to 20 percent aromatic hydrocarbons. Overexposure to Stoddard solvent causes irritation of the eyes, nose, and throat and may cause dizziness, fatigue, and in extreme cases, unconsciousness and death. Dermal

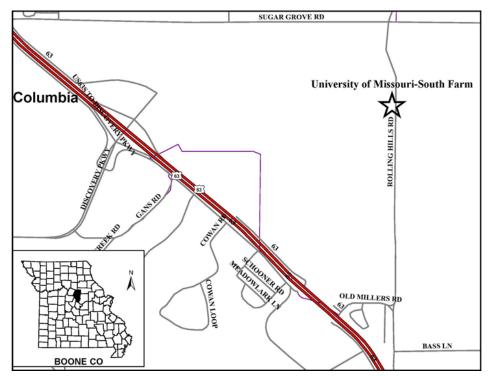
exposures to the solvent can cause skin irritation, dermatitis and jaundice.

At present, the risk to public health is minimal, as groundwater in this area is unsuitable for drinking purposes.

Based on available information, a potential health risk remains at the site due to the known concentrations of the contaminants in the soil and water. Current risks are low as long as the area remains paved and the groundwater is not being used for drinking.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

University of Missouri - South Farm



<u>Site Name</u>: University of Missouri - South

Farm

Classification: Class 3

<u>Date of Registry Placement</u>: January 1, 1984

<u>Site Address</u>: Along Rolling Hills Road, southeast of Columbia, Missouri, NE 1/4, SE 1/4, NW 1/4, Sec. 34, T. 48N, R. 12W, Boone County, Columbia Quadrangle

Present Property Owner: University of

Missouri

Lead Agency: DNR

<u>Waste Type</u>: Laboratory wastes, waste solvents, farm chemicals, and radioactive

waste

Quantity: Undetermined amounts of waste, because wastes were subject to open burning and only residues remain.

Site Description:

The University of Missouri-South Farm Site is an abandoned hazardous waste site used by

the University to burn laboratory wastes and solvents from 1967-1978. The residues from this process were buried on site. The site is located in the University of Missouri - Columbia's experimental farm. The entire area is well-vegetated. The site is about 20 feet from a rural paved road. Although the site was located in rural Boone County at the time of disposal, recent development has made the site part of a rural residential area. No homes are immediately adjacent to the site; however, a house is located within 0.1 miles from the site.

The area used for hazardous waste disposal is now capped and vegetated.

Environmental Problems and Areas of Concern Related to Site:

Burned wastes, contaminated soil, and shallow groundwater contamination are concerns.

Remedial Actions at Site:

The entire farm is fenced to limit public access, and the disposal site is also fenced to prevent access by livestock.

Signs identifying the site as a "Chemical Disposal Area" and warning "Keep Out" are on the gate and the fence.

The Missouri Department of Natural Resources (the department) completed a Site Inspection (SI) in 1991. The SI concluded hazardous substances are present in the buried trenches and shallow water contamination is occurring. The chemicals 2,4-D and 2,4,5-T were detected in water samples taken from the on-site borings at concentrations above the detection limit.

The University was accepted into the department's Brownfields Voluntary Cleanup Program (BVCP) in 1997 to further characterize the site and determine the need for remediation or monitoring. The University's planned site characterization work included drilling of three monitoring wells into bedrock to assess migration of the wastes from the burial site. The plan was approved in the spring of 1998.

In early spring 2000, the University's consultant performed an investigation pursuant to the 1998 work plan approved by the BVCP. This involved both soil and groundwater. Monitoring wells were installed up- and down-gradient of the site to determine whether groundwater is impacted. Soil samples were taken as well as sediment and water samples from nearby Gans Creek.

Pursuant to the University's consent order with the U.S. Environmental Protection Agency (EPA) to investigate the site by the end of 2001, soil and groundwater investigations proceeded during 2000-2001. Four monitoring wells were installed, and quarterly groundwater monitoring was conducted through early 2002 to establish a baseline and observe trends in groundwater quality.

Surface water and sediment samples collected from Gans Creek showed no detectable contaminants discharging to the creek. Surface soil samples collected from the burial area showed no detectable contaminants. However, shallow groundwater samples from temporary monitoring points contained 13 volatile organic compounds (VOCs) such as dichloroethane, benzene,

chlorobenzene and chloroform. Lower levels of 17 VOCs and chlorinated herbicides were found in shallow bedrock monitoring wells at water level depths of 13 to 37 feet below ground. The chemical 1,4-dioxane was the only detected contaminant in the farthest down gradient well, closest to Gans Creek. Due to its solubility and mobility; 1,4-dioxane would be expected to migrate more quickly than the other contaminants.

At least one well is contaminated with 1,4-dioxane which is a mobile, water-soluble solvent used in scintillation countering fluid. These results indicate that wastes buried at the site have migrated from the burial trenches. At this time, there is no evidence that the contaminants are reaching any receptors, including Gans Creek, or drinking water wells in the area.

UMC will begin further investigation work soon. Additional wells will be installed to investigate groundwater plume.

General Geologic and Hydrologic Setting:

The site is located on a west-facing, moderately gentle slope. Gans Creek, which occupies the valley downslope, flows to the southwest and through Rock Bridge Memorial State Park. It eventually merges with Clear Creek to form the Little Bonne Femme Creek which then enters the Missouri River.

The soil underlying the site consists of a relatively thin layer of silt and silty clay of glacial origin. The total soil thickness above bedrock is estimated to be eight to 20 feet.

Bedrock in the immediate vicinity is composed of Pennsylvanian-age cyclic deposits of sandstone, siltstone, shale, underclay, limestone, and coal. This bedrock, which is expected to be 20 to 40 feet thick, probably has low permeability.

Groundwater is obtained from two major bedrock aquifers in this area. The shallow bedrock aquifer, composed of Mississippian limestones, underlies the Pennsylvanian bedrock and provides low yields to private wells. The deep aquifer, composed of Cambrian- and Ordovician-age carbonates and sandstones, is isolated from the shallow

aquifer by a thin layer of Devonian limestone, which acts as a "leaky" confining unit. The deeper aquifer is used as a source of public water supply and for other uses that require high yields. Poorly-cased wells may provide an avenue for downward migration for contaminants.

The low permeability of the glacial soil and overall low permeability of the Pennsylvanian bedrock are expected to prevent deep groundwater from being affected. Shallow, perched groundwater possibly exists in the glacial soil or at the top of the bedrock. Perched water is expected to move horizontally, reappearing downslope and potentially affecting surface water in the Gans Creek watershed.

Public Drinking Water Advisory:

The site is about one mile southeast of two public drinking water wells serving the Columbia Environmental Research Center. Other public wells are located 1.75 miles from the site. All public wells in the area are cased to at least 400 feet. No effects on the public wells have been observed.

Health Assessment:

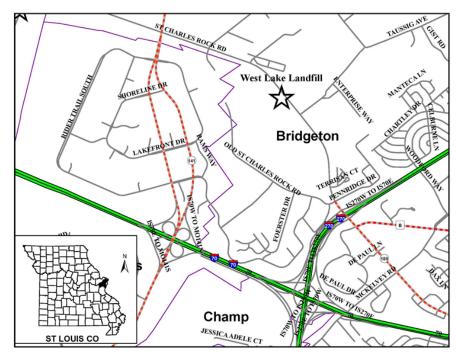
The University burned and buried xylene, pesticides, cleaning solvents, laboratory wastes and possibly radioactive wastes at the site. Because concentrations of these residues are unknown, it is difficult to estimate the health effects that might occur if persons

were exposed to them. However, solvents and pesticides could cause central nervous system depression and some of them may be carcinogenic.

Exposure is only likely to occur through ingestion of contaminated groundwater. Residential development of land adjacent to the site is occurring at an increasing rate. However, no residences for a distance of three miles are known to use groundwater for drinking water. Public water is available for the area surrounding this site. No evidence of groundwater use near the site has been discovered during site visits. The entire area that was used for waste disposal is now capped. Most of the site is well vegetated. As long as the cap is maintained, contact with contaminated soil is not considered a potential route of exposure.

Based on available information, there is limited potential for exposure to hazardous substances at the site.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: West Lake Landfill

Classification: Class 3

<u>Date of Registry Placement</u>: February 22,

1985

Date of NPL Listing: August 30, 1990

<u>Site Address:</u> 13570 St. Charles Rock Road, Bridgeton, St. Louis County, Missouri, between Old St. Charles Rock Road and St. Charles Rock Road east of Earth City, T. 46N, R. 5E, St. Charles Quadrangle

<u>Present Property Owner</u>: Rock Road Industries, Inc.

Lead Agency: EPA

<u>Waste Type</u>: Radionuclides, industrial solid wastes, and municipal wastes

Quantity: About 8,700 tons of uranium ore procession residue wastes were mixed with 39,000 tons of soil and used in solid waste landfill operations.

Site Description:

The 200-acre West Lake Landfill includes two

inactive landfill areas and an area known as the Buffer Zone/Crossroad property that contain radiologically impacted materials (Operable Unit 1 or OU-1). Operable Unit 2 (OU-2) covers the remainder of the property including several permitted solid waste disposal areas such as a former active sanitary landfill (known as Bridgeton Sanitary Landfill), an inactive demolition landfill, and parts of an inactive sanitary landfill. The site lies partially within the Missouri River geomorphic flood plain in northwest St. Louis County and is protected by an engineered levee system. The radiological waste was deposited in 1973. Records indicate that about 8.700 tons of leached barium sulfate containing about 7 tons of uranium were mixed with about 39,000 tons of topsoil and taken to the landfill. A chain link fence has been erected to restrict access to the site.

Deed restrictions have been placed on the entire West Lake Landfill Site to prevent residential development or groundwater use from occurring on the landfill. Additional deed restrictions have been placed on the radiologically impacted areas to prevent construction of buildings or utility excavations.

Environmental Problems and Areas of Concern Related to Site:

Groundwater is present within the alluvium and bedrock deposits beneath the site. Historical and recent groundwater sampling show concentrations above the Maximum Contaminant Level (MCL) for certain radionuclides, trace metals and volatile organic compounds. The recent quarterly groundwater sampling will be compared with the historical data and results of this comparison will be presented in an upcoming final report.

The site poses a potential threat to on-site users from external gamma radiation and radon gas emissions. Due to increased worker activity associated with the Bridgeton Sanitary Landfill subsurface smoldering event, the radiologically contaminated areas were completely fenced to prevent access.

Remedial Actions at Site:

The site was placed on the U.S. Environmental Protection Agency's (EPA) National Priorities List on August 30, 1990. mandating that the EPA conduct response actions at the site. After negotiating with the Responsible Parties (RPs), an Administrative Order on Consent (AOC) was signed in March 1993 to conduct a Remedial Investigation/ Feasibility Study (RI/FS) of the radiologically contaminated portions of the landfill (OU-1). The responding RPs include Cotter Corporation: Republic Services, Inc.: Bridgeton Landfill, LLC; Rock Road Industries, Inc.; and the U.S. Department of Energy. Bridgeton Landfill and the EPA negotiated a second AOC in December 1994 to perform an RI/FS for the non-radiological waste portions of the landfill.

A Remedial Investigation (RI) report, baseline risk assessment, and Feasibility Study (FS) have been completed for both Operable Units (OU's).

EPA prepared a Proposed Plan, held public meetings, and developed a Record of Decision (ROD) for both OU's.

The OU-1 ROD was signed on May 29, 2008.

The Selected Remedy for OU-1 is to consolidate and contain radioactive materials in place using a modified engineered cover system with long-term groundwater monitoring, institutional controls, inspection, maintenance, and periodic reviews. EPA signed the ROD for OU-2 on July 25, 2008. The Selected Remedy for the OU-2 is containment in place using an engineered landfill cover system consistent with Missouri Solid Waste Regulations, long-term monitoring, maintenance, institutional controls, inspections, and periodic reviews. Some members of the public oppose EPA's selected remedy for OU-1. There is no opposition to the selected remedy for OU-2.

Negotiations began with the RP's to begin the Remedial Design (RD) in 2008, but this work was put on hold to perform additional work to the OU-1 FS.

On January 11, 2010, the EPA requested the RP's to perform a Supplemental Feasibility Study (SFS) to further evaluate excavation and disposal remedies for radiological impacted materials against the selected remedy of capping in place. The initial SFS was finalized in December 2011.

On October 12, 2012, the EPA requested additional work to the SFS to include more detailed evaluations of the partial excavation alternative, alternative landfill cap designs, and treatment technologies as well as a fate and transport study. The EPA also requested additional quarterly rounds of groundwater sampling continue into 2013. The EPA conducted a downhole gamma survey in November 2012, as well as a gamma and infrared flyover in March 2013.

Meanwhile in December 2010, elevated temperatures were detected in Bridgeton Sanitary Landfill which is part of OU-2. The Bridgeton Sanitary Landfill which is generally described as consisting of two landfilled areas: the North Quarry, and the South Quarry. The thermal reaction began in the South Quarry portion of the landfill and developed into a subsurface smoldering event (SSE) which is being overseen by the department's Solid Waste Management Program. On May 13, 2013, Bridgeton

Landfill entered into an Agreed Order with the State of Missouri to address the SSE as well as control emissions/odors.

Efforts have focused on establishing the necessary infrastructure to isolate, contain, and monitor the SSE. For these efforts, the facility has made extensive modifications to the South Quarry gas collection and control system (GCCS) and leachate collection system, and installed a synthetic capping system over the South Quarry and constructed an on-site leachate treatment system. Monitoring the SSE in the South Quarry involves collection of gas temperature and composition at gas extraction wellheads, measurement of in-situ waste temperature, and mapping landfill surface settlement. The department also maintains a network of air monitoring equipment surrounding the Bridgeton Landfill. Proactive measures were also implemented to prevent the SSE from entering the North Quarry. These actions included installation of gas interceptor wells, and additional temperature monitoring probes to monitor migration.

The RPs have also agreed to install an isolation barrier to prevent the SSE from coming in contact with the radiologically-impacted material in Area 1. Subsurface investigations were conducted in the area between the North Quarry and Area 1 to find a suitable location for the Isolation Barrier. On April 16, 2014, the EPA and RPs entered into an AOC to perform preconstruction work for the isolation barrier. A work plan was approved by EPA to identify potential areas for management/relocation of excavated waste, develop a bird hazard mitigation plan, develop a perimeter air monitoring plan, and install litter fencing.

Additionally, in response to the proximity of the SSE to Area 1, the EPA requested the RPs to include a risk analysis of the SSE in the SFS. The EPA also requested that impacts from potential tornadoes be included in the SFS.

After the additional SFS work is complete the EPA will develop a new Proposed Plan followed by a public comment period and a ROD amendment.

General Geologic and Hydrologic Setting:

The landfill has existed since the 1950s. Initially, landfilling occurred on the Missouri River geomorphic flood plain. However, landfilling also took place in a limestone quarry adjoining the flood plain landfill. The quarry is in the St. Louis Limestone, which crops out along the eastern slopes of the Missouri River flood plain. The initial landfill operation included excavation and filling within the geomorphic flood plain. Subsequent landfill operations generally were confined to filling on top of the flood plain surface and in the adjoining limestone quarry. Currently, the area is protected from flooding by the Earth City Levee system which is designed to exceed 500-year flood levels.

The Missouri River alluvium consists of 15 to 20 feet of silt loam to very silty clay, with moderate permeability. The groundwater table occurs at depths of 15 to 20 feet below flood plain level. Fluctuations of 5 to 15 feet occur when prolonged wet seasons affect the level of the Missouri River.

Beneath the very silty clay, the Missouri River alluvial sediments are characterized by a general increase in grain size associated with increasing depth. Sand becomes noticeable at depths of 20 to 30 feet, with gravel beginning to occur at depths of 30 to 40 feet.

Public Drinking Water Advisory:

No public water systems are located in the immediate vicinity of West Lake Landfill. However, the site is less than two miles from the Missouri River, which is the water source for St. Louis County Water Company's North Plant. The intake for that plant is about 8 miles downstream from West Lake Landfill. Should contamination from the site reach the Missouri River, the downstream public water system could be potentially affected. The selected remedy for West Lake Landfill includes long-term monitoring of groundwater beneath the site to address this issue.

Health Assessment:

Inorganic chemicals and radionuclide contamination identified in shallow soils at the site may lead to unacceptable exposure.

Areas evaluated include Area 1, Area 2, and the Buffer Zone/Crossroad property (formerly the Ford Property). Inorganic chemicals identified as chemicals of concern (COC) include arsenic, lead, and uranium. Radionuclides include the uranium series (uranium-238, uranium-234, thorium-230, radium-226, and lead-210), thorium series (thorium-232, radium-228), and the actinium series (uranium-235 and protactinium-231). Health effects for inorganic chemicals including arsenic lead, and uranium, and radionuclides are presented in Appendix A, Health Effects Assessment Table.

In the past, the Missouri Department of Health and Senior Services completed an exposure assessment that included a well survey, water sampling, and a health questionnaire for the site. Water samples from private drinking water wells in the vicinity of the site (i.e. within a one mile radius) were collected in 1988 and 1989 for radiological contaminant (gross alpha) and pesticide analysis. Results of the questionnaire did not reveal any patterns of adverse health effects consistent with the hazardous materials at the landfill. None of the water samples had gross alpha levels exceeding the Environmental Protection Agency drinking water standard of fifteen picocuries per liter (15 pCi/L). Pesticides were not detected in the water samples. The wells that were tested are no longer in use.

Groundwater sampling performed in July/August 2012 and April, July, and October 2013 indicates that contamination including radiological, metal, and chemical contamination is present in groundwater underneath the site and at the property boundaries. Detected contaminants that exceed health-based groundwater cleanup goals include arsenic, lead, various organic chemicals, and total radium (radium-226 and radium-228 combined). Contamination is present in some of the monitoring wells located at the property boundary, both on the west and northwest. However, even though the health-based goals are exceeded in these monitoring wells, there are no current or foreseeable domestic uses of groundwater. Because the health-based goals are based upon domestic use of groundwater, risk from groundwater contamination is not expected. The results of these groundwater sampling

events will be presented in a final Groundwater Monitoring Report.

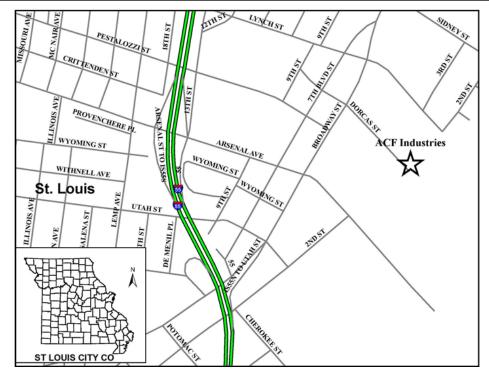
As for current soil contamination, risk from exposure has been estimated for various workers within Area 1, Area 2, and the Buffer Zone/Crossroad Property. No unacceptable risks were identified for any receptors offsite for the Buffer Zone/Crossroad Property. Risks for Area 2 slightly exceed the acceptable range only for a hypothetical worker and do not impact the public offsite. Radium-226 and its decay products present ninety percent (90%) of the risk in this area.

The supplemental feasibility study is currently being revised. Risk assessment for potential remedies will be evaluated in the revised document.

Based on available information, if no site cleanup is done, a potential health threat exists from inorganic and organic chemicals and radionuclide contamination at the site for onsite workers. While there is no evidence of past or present exposure, the potential for future exposure exists based on direct contact with waste materials and contaminated soil.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, Missouri, 65102-0570; (573) 751-6102.

CLASS 4 SITES



Site Name: ACF (American Car Foundry)

Classification: Class 4

<u>Date of Registry Placement</u>: February 22, 1985

<u>Site Address:</u> Dorcas and Second Street (2800 DeKalb Street), St. Louis, Missouri, a portion of City Block 769, St. Louis, Missouri

<u>Present Property Owner</u>: Anheuser-Busch Companies

Lead Agency: DNR

Waste Type: Volatile organic compounds

Quantity: An estimated 12,230 gallons of solvent had been spilled over a 36-year period. Following remediation, residual contamination remained in the soil subsurface and shallow groundwater.

Site Description:

The site was once a railroad car manufacturing facility where solvents were spilled while cleaning paint from stencils. An estimated 12,230 gallons of solvents

inadvertently were spilled on the ground over the lifetime of this operation. Today, the site is covered by an asphalt parking lot.

The site is in an industrially zoned area of St. Louis. Although the site is fenced, it is accessible to the public via a roadway. The nearest off-site building lies 300 feet to the west. About 18 industrial buildings are located within 1,000 feet of the stencil cleaning area.

Environmental Problems and Areas of Concern Related to Site:

Following remedial actions at the site, residual levels of contamination remain in the soil subsurface and shallow groundwater.

Contamination migrated through the soil into the groundwater prior to the cleanup.

The site is located in the recharge area of the Mississippi River, which is 0.25 miles to the east. Groundwater in this area is not used for drinking water or agricultural purposes, but groundwater movement is toward the Mississippi River. While St. Louis obtains its drinking water from the Mississippi River upstream from the ACF Site, other towns downstream do use the river as a water

source.

Remedial Action at the Site:

The site was identified in 1981 as the result of a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) notification. An estimated 12,230 gallons of solvent had been spilled from 1945 to 1981, at an area used to clean paint from stencils. In 1983, ACF Industries Inc. retained Rollins Environmental Services Inc., to assist in the assessment and cleanup of the stencil-cleaning area. Rollins conducted the field assessment in September 1983 and recommended removal of the contaminated soil.

A remedial action plan for site cleanup, approved by the Missouri Department of Natural Resources (the department) was implemented in March 1984. A total of 1,530 cubic yards of contaminated material was removed from the site, which removed an estimated 90 to 95 per cent of the solvents. The excavation was backfilled with clay, covering up the remaining contaminated soil. Backfilling of the excavation was completed by April 27, 1984. As excavated sections were closed, samples were collected. After final closure, analytical results showed residual levels of solvents still present in the soil subsurface and in the shallow groundwater. The remediation report prepared by Rollins concluded that the cost of removing the residual contamination was economically prohibitive.

In 1985, ACF transferred the property title to Yellow Freight Systems Inc., of Delaware.

On April 9, 1987, the department approved a request by Yellow Freight for the demolition of structures on the property and pavement of portions of the property. No excavation was planned for the contaminated area of the property. The company also re-surveyed the property to accurately designate the contaminated area. In January 1991, an "Affidavit of Release" was filed by the department with the St. Louis City Recorder's Office, releasing all property not designated as part of the contaminated area. The department verified that appropriate survey markers were installed and in place,

designating the contaminated property and the appropriate 100-foot buffer zone. Anheuser-Busch Companies (ABC) purchased the site from Yellow Freight Systems Inc. ABC enrolled the site in the department's Brownfields Voluntary Cleanup Program (BVCP) in March 1999. ABC performed soil and groundwater investigations and limited response actions under BVCP oversight. A previously undiscovered underground solvent storage tank was removed, and a soil and asphalt cap was placed over the contaminated area. Residual solvent contamination of subsurface soil and shallow groundwater remains. ABC placed a restrictive covenant in the property chain of title restricting use of the property to industrial uses and requiring maintenance of the cap. The BVCP issued a Certification of Completion in February 2001.

General Geologic and Hydrologic Setting:

The site is located on the Mississippi River flood plain 0.25 miles from the Mississippi River.

Soils are composed of artificial fill and alluvium. The alluvium at the surface is generally composed of fine-grained clay and silt. Coarse-grained alluvium, composed principally of sand, is expected at depth. The water table is relatively shallow (10 to 20 feet), but varies somewhat with river stage.

Because the spill area is located in an industrialized area downstream from the railroad terminal, it is possible that contaminants unrelated to this particular spill are present in the groundwater at the site. Materials that have remained following cleanup activities at this site will eventually migrate through the alluvium into the Mississippi River. The rate of movement of contaminants through the shallow groundwater system is expected to be relatively low, and a number of years may pass before the plume reaches the river.

Public Drinking Water Advisory:

The city of St. Louis has two water plants with intakes on the Missouri and the Mississippi Rivers. The ACF Site is 0.25 miles from the Mississippi River, but is downstream of the

city's intake structure. The site poses no threat to the public water system.

Health Assessment:

Trichloroethylene (TCE), tetrachloroethylene, methylene chloride, dichloroethene, benzene, toluene, and xylene were present in groundwater and soil samples collected from the site. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Remedial action reduced the concentrations of the contaminants in the soil to levels below risk-based limits with the exception of TCE.

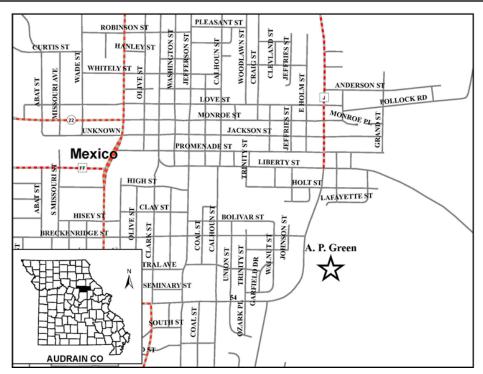
The potential risks to health at this site are associated with exposure to the contaminated soil and the shallow groundwater. Thus, any future soil disturbance or any future use of the shallow groundwater would provide a route for human exposure. Present risks are low because the area of contamination is covered with asphalt and fenced, and the

contaminated groundwater has not been found to be a part of any aquifer used for drinking water. Anheuser-Busch continues to use the property as a parking lot.

Based on the available information, the soil and groundwater at this site still contain contaminants at levels that could cause adverse health effects. The contaminants do not pose a current health risk as they are not accessible by the public. As long as the restrictive covenant on the site is honored, the site should not present a public health risk.

Due to closure of the plant, if transfer of the property to private ownership is proposed, disturbance of the pits or development of private wells on or adjacent to the site may pose an increased risk to public health.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: A. P. Green

Classification: Class 4

Date of Registry Placement: June 14, 1984

<u>Site Address</u>: Green Boulevard, Mexico, Audrain County, Missouri, Vandalia Quadrangle. The site is made up of six individual waste dumps with the following descriptions of location:

- (1) Waste Dump No. 2, SW 1/4, SE 1/4, Sec. 31, T. 51N, R. 8W;
- (2) Waste Dump No. 4, SW 1/4, SE 1/4, Sec. 31, T. 51N, R. 8W and portions of NW 1/4, NE 1/4, Sec. 6, T. 50N, R. 8W;
- (3) Dynamite Dump No. 5, N 1/2, NE 1/4, Sec. 6, T. 50N, R. 8W;
- (4) Waste Dump No. 6, NE 1/4, NW 1/4, Sec. 6, T. 50N, R. 8W;
- (5) Waste Dump No. 7, SE 1/4, NW 1/4, and portions of the SW 1/4, NE 1/4, portions of NW 1/4, SE 1/4, and portions of NE 1/4, SW 1/4, Sec. 6, T. 50N, R. 8W; and
- (6) Waste Dump No. 8, NW 1/4, SW 1/4, Sec. 31, T. 51N, R. 8W.

<u>Present Property Owner</u>: Environmental Liability Transfer.

Lead Agency: DNR

<u>Waste Type</u>: Dynamite and heat treating (cyanide) compounds

Quantity: Estimated 5,000 pounds of dynamite and undetermined quantity of cyanide compounds remain buried on site.

Site Description:

The A.P. Green Refractories Site consists of six separate clay pits encompassing nearly 14 acres. These pits were dug originally to provide raw material for the production of refractory products. Records indicate that since 1954, these pits were used for waste disposal. Heat treatment wastes, possibly containing cyanide and totaling about 150 gallons, were deposited in five of the six pits. About 5,000 pounds of 2,4,6-trinitrotoluene (TNT) was deposited in the sixth pit. One of the six pits (WD-7) is part of a permitted demolition landfill. Pit WD-1 reportedly contains metal piping once used for acid transfer, and pit WD-3 contains asbestos. However, these two pits are not included in the area that is listed on the Registry.

The closest residential area is 1.25 miles from the site. The nearest commercial or industrial

area is 0.5 miles. A publicly traveled area is 1,500 feet away, and a public use area is two miles from the site.

Farmland surrounds the six hazardous waste disposal sites. The loss of control of the farmland surrounding the hazardous waste disposal sites would compromise security and access to the sites. Construction of a bypass for Highway 54 was completed in fiscal 1995. The bypass is located southeast of waste dumps No. 5 and 7.

Access to the site is restricted. The property is fenced and posted with warning signs. The guardhouse at the site entrance currently is unmanned.

Environmental Problems and Areas of Concern Related to Site:

Buried dynamite is the primary concern at this site. The dynamite is a nitro-based material. Since the dynamite was buried in clay pits, water infiltration potentially may have caused nitro pools. Water tends to pond in the clay pits, increasing the likelihood of water moving through the landfilled material. The stability or explosive life of the buried dynamite is unknown. Worker injury, fire or explosion could occur if someone tries to unearth the material. Numerous ponds and streams are in the area. The site is well to sparsely vegetated with some minor gully erosion near waste pit WD-7.

Remedial Actions at Site:

Following Registry notification, the property owner submitted a legal survey to reduce the size of the property appearing on the Registry. Permanent survey markers were installed at the corners of the six contaminated pits, including a 100-foot buffer zone in all directions. Each site is marked and signs were placed to indicate that hazardous waste is buried there.

The Missouri Department of Natural Resources (the department) concluded a Site Investigation (SI) in 1991. The SI concluded there appears to be little risk unless the buried waste is disturbed. The buried hazardous substances are stable and apparently not

migrating. The SI concluded the individual sites should continue to be monitored, maintained and undisturbed.

General Geologic and Hydrologic Setting:

The sites are located in an upland setting. Glacial till, about 100 feet in thickness, overlies Pennsylvanian-age bedrock. Both the surficial material and the bedrock are characterized by low permeability.

Shallow groundwater is present in the glacial till; however, yields are generally low. The approximate location of the water table is at the contact between the surficial material and the bedrock. Groundwater found at this depth is normally highly mineralized and does not meet drinking water standards.

Due to the low permeability of the surficial material, numerous ponds exist in the area. In addition, clay pits in the area retain water, creating artificial ponds. Streams in this region tend to be gaining.

Groundwater supplies are not anticipated to be significantly affected by site contamination. However, surface water may be affected by leakage reaching the Long Branch Creek to the east, or South Fork of the Salt River to the west.

Public Drinking Water Advisory:

City wells penetrating consolidated formations are located one to three miles from the site. The site poses no threat to the public water system.

Health Assessment:

The chemicals of concern in soil and shallow groundwater include cyanide, asbestos, and TNT. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

The individual pits composing this site are restricted from public use, and the materials are buried at depths from 6 to 40 feet. Department personnel have concluded that because of the massive deposits of clay

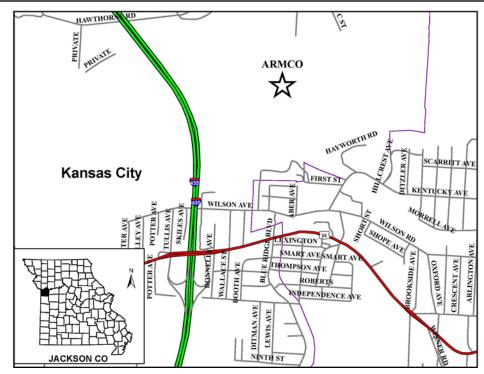
surrounding and underlying the site, the potential for off-site migration of the chemicals through groundwater movement is very small. Waste Pit 7 used for disposal of explosives exists within a high-voltage overhead electric line easement. This poses a potential threat to persons performing work in the utility line easement due to ignition of the materials from high voltage. Otherwise, the only likely exposure to these chemicals appears to be if excavation or erosion were to occur. This could result in adverse health effects through inhalation, ingestion or dermal absorption of contaminants by contact with buried waste, or contaminated soil and groundwater

Direct exposure to the contamination on-site is unlikely to occur at this site. An exposure investigation conducted by the Missouri Department of Health and Senior Services (DHSS) found no evidence of human exposure to contaminants from the site. A site inspection by the department in 2007 verified that access to the site is restricted, and no

development is occurring. If transfer of the property to private ownership is proposed, disturbance of the pits or development of private wells on or adjacent to the site may pose an increased risk to public health.

Based on the information available, the DHSS has determined that this site does not currently pose a health hazard to the general population. Similarly, workers and trespassers on the site should not be at risk provided the waste materials are not carelessly disturbed.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: ARMCO

Classification: Class 4

<u>Date of Registry Placement</u>: January 1, 1984

Site Address: 7000 Winner Road, Kansas City, Jackson County, Missouri, Portions of SW 1/4, Sec. 29; NW 1/4, Sec. 32; and NE 1/4, Sec. 31, T. 50N, R. 32W, Independence Quadrangle

Present Property Owner: AK Asset
Management Company, Mile Rail LLC, Blue
Summit LLC, OneSteel Limited, CTE
Properties LLC, House of Burgessess LLC,
Hansen Property Development Inc.
Registered and non-registered property
owned by these companies composes the AK
Steel facility under RCRA.

Lead Agency: EPA

<u>Waste Type</u>: Lead, cadmium and zinc in the Registry areas. Arsenic, cadmium, lead, volatile organic compounds and semi-volatile organic compounds in non-Registry areas of the RCRA site.

Quantity: About 27,000 tons remain in the

Registry areas.

Site Description:

The ARMCO complex is an inactive steel manufacturing plant. From 1962 to 1980, ARMCO disposed electric furnace baghouse dust generated from steel production processes in two landfills located on its property. Baghouse dust generated by ARMCO contained leachable quantities of lead and cadmium and a high concentration of zinc (10-12 percent). After 1980, this waste became regulated by the Resource Conservation and Recovery Act (RCRA). Both landfill areas are listed on the Registry.

Site investigation and remediation is currently being performed under a US EPA Hazardous and Solid Waste Amendment Part II Permit issued November 30, 1994. Reissuance of the permit by the Missouri Department of Natural Resources' (the Department) Hazardous Waste Program as a Missouri Hazardous Waste Management Facility Part I Permit is expected to occur in the future. Any further investigation and remediation will be performed under the jurisdiction of the new permit.

This site is located in an industrial area of

Kansas City. Access to the site is restricted by fencing but is accessible by water via the Big Blue and Missouri rivers.

Environmental Problems and Areas of Concern Related to Site:

The landfill areas are capped with about 3 feet of dirt and a good vegetative cover. Baghouse dust in the RCRA landfill was reportedly hydrophobic and therefore may not be susceptible to leaching. Groundwater monitoring conducted at the RCRA landfill indicated that contaminants were not leaching from the landfill. Monitoring of the RCRA landfill was discontinued in 1998. Both landfills were impacted by the 1993 flood; however, the landfill caps did not erode.

Groundwater at the site is used only for monitoring, and future use by the facility is not anticipated. Seventeen industrial process or potable supply wells exist within a three-mile radius of the RCRA landfill located on site. The current status of these wells is unknown.

A proposed route for construction of the Lewis and Clark Expressway, formerly called the South Riverfront Expressway, may transect a portion of the property currently listed on the Registry. The expressway will connect from I-435 and Front Street south of the Missouri River, and extending to Sterling Ave in Sugar Creek. The department is continuing to work with stakeholders on this project to address any potential human health or environmental impacts associated with the planned expressway development.

Remedial Actions at Site:

The RCRA landfill is currently permitted by the Department. Site-wide corrective action is being addressed pursuant to an EPA-issued HSWA permit with the department acting as technical lead. Thirty-nine Solid Waste Management Units (SWMU) and eight Areas of Concern (AOC) were identified as part of the RCRA Facility Assessment conducted on the behalf of EPA. Of these, nineteen SWMUs and four Areas of Concern AOC are being addressed under the current permit. Seven of these SWMUs are located on property now owned by companies other than AK Steel. Two SMWUs are owned by The

Andersons Inc., two SWMUs are owned by Hansen Property Development Inc., two SWMUs are owned by House of Burgessess, LLC, and one SWMU is owned by Blue Summit LLC.

AK Asset Management Company conducted interim measures to address certain known areas of contamination. AK Asset Management Company conducted a RCRA Facility Investigation (RFI) and a Supplemental RFI to assess potential releases to the environment from the SWMUs and AOCs. EPA and the department approved both documents on February 3, 2009. AK Asset Management Company submitted an Interim Measures Work Plan for the SWMU located on property owned by Blue Summit, LLC. This work plan has been approved by EPA and interim measures are currently being conducted on property owned by Blue Summit, LLC. Mill scale is being removed from the Mill Ponds and is being reused by Lafarge as an additive to cement. Blue Summit LLC received a conditional use permit from the City of Kansas City to use the former mill ponds as a "clean fill" demolition debris landfill. Material will not be placed in the demolition debris landfill until the mill scale has been removed to the satisfaction of EPA and the department.

On February 2, 2000, an "Affidavit of Release" was filed with the Jackson County Recorder of Deeds, releasing a very small, uncontaminated portion of the site owned by the Kansas City Terminal Railway Company.

In 2013, AK Asset Management Company conducted an investigation of suspected historical mercury disposal at a former boil house on the Armco Property. As a follow up to the mercury investigation AK Asset Management Company conducted additional sampling of the Boiler House for mercury speciation. The Mercury Speciation Report is currently being reviewed by EPA and MDNR. July 16, 2013, AK Asset Management Company submitted a Corrective Measures Study (CMS) Report for SWMUs 2,3,4,5,6,7,12,13,17,24,and 33 and AOCs 1,4, and 8. The CMS is currently being reviewed by EPA and the Department.

General Geologic and Hydrologic Setting:

Surface soils are composed primarily of lowpermeability, alluvial, silty clay, underlain by moderate-permeability alluvial silt and sand. Wastes were deposited in permeable materials within an abandoned meander of the Big Blue River at or below the water table.

The silty, clay material present at the surface forms a relatively impermeable barrier to the downward movement of surface contaminants. Wastes deposited in the silt and sand material, however, are anticipated to affect shallow groundwater in the vicinity of the site. Surface migration of contaminants could also occur during heavy flooding.

Depth to the water table ranges from 10 to 20 feet. Groundwater is expected to flow toward the Big Blue and Missouri rivers; consequently, contaminants that enter groundwater supplies are anticipated to resurface at either the Missouri River or Big Blue River. There are no known drinking water wells producing from the alluvial aquifer in the projected area of potential groundwater contamination.

Public Drinking Water Advisory:

The site is located near the bank of the Big Blue River, about three miles above its confluence with the Missouri River (River Mile 356.8), and poses little threat to downstream public water systems.

Health Assessment:

Baghouse dust generated by Armco has been found to contain leachable quantities of lead and cadmium. This dust also contains a high concentration of zinc (10-12%). Exposure to lead has been found to cause fatigue, headache, aching bones and muscles, constipation, decreased appetite, and anemia. Chronic exposure may cause irreversible central nervous system and kidney damage. Exposure to cadmium may cause damage to the respiratory tract, kidney, and liver. There is also evidence that cadmium and lead may be carcinogenic to humans. Adverse effects following ingestion of zinc are only associated

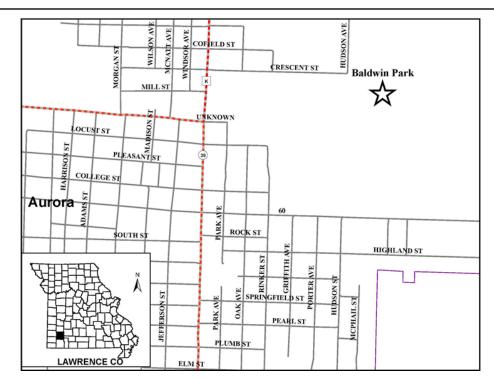
with high doses and include gastrointestinal distress, nausea, and vomiting.

The only release of contaminants from the site appears to be via surface runoff into the Blue River. The department and the U.S. Geological Survey conducted a study of storm water runoff into the Blue River basin. This study revealed that immediately following rainstorms in the lower Blue River basin, the level of zinc doubled between the upstream and downstream sampling points from Armco. This study also showed smaller increases in the lead concentration in the river at the downstream sampling site Following heavy rainfall events zinc and lead in the Big Blue River would be present in high concentrations in the suspended solids. As the suspended solids settle out, the lead and zinc in the deposited sediment would potentially be available to bioaccumulate in fish and other aquatic organisms.

The landfills are located well away from most remaining plant activity and are surrounded by the large AK Steel/Compass Big Blue properties, which act as a buffer between the waste and off-site areas. A previous exposure investigation conducted by Missouri Department of Health & Senior Service's personnel documented no significant human exposure from this site. Access to the site is restricted.

Based on the available data, a health threat exists at this site. Access to the site should continue to be restricted.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: Baldwin Park

Classification: Class 4

Date of Registry Placement: September 23,

1986

<u>Site Address</u>: Baldwin Park is located on High Street in the extreme northeast corner of the town of Aurora, Lawrence County, Missouri, NE 1/4, Sec. 7, T. 26N, R. 25W, Aurora Quadrangle

Present Property Owner: City of Aurora

Lead Agency: EPA

<u>Waste Type</u>: 2,3,7,8-TCDD (dioxin), 2,4,5-Trichlorophenoxyacetic acid (2,4,5-T),

hexachlorophene, and lead

Quantity: Not determined

Site Description:

The site is now the location of a municipal park. Historically, the area was strip mined for zinc ore. When mining operations ceased, the city of Aurora and surrounding communities used the pits as a dump for municipal trash. Reports indicate that in the mid-1960s, dioxin-

contaminated wastes generated by Hoffman-Taff Corporation were buried at the site. Later sampling substantiated these reports. The dump was closed and capped in the 1970s, and the area was converted into a park.

Following a request by the city of Aurora to reduce the area listed on the Registry, additional sampling to delineate the area of contamination was conducted on July 25, 1996. Dioxin was not detected in the northern and northeastern areas of the park. The area on the Registry was reduced to include only 60 acres in the southwestern area of the park.

Environmental Problems and Areas of Concern Related to Site:

In 1987, the dioxin impacted portion of the site was partially cleaned up, capped and vegetated under the oversight of the Missouri Department of Natural Resources (the department) and the U.S. Environmental Protection Agency (EPA). The most heavily contaminated areas were cleaned up to a dioxin level of 20 parts per billion (ppb) or less. The capped areas are to be maintained in order to prevent erosion and human exposure. Two of the capped areas are within the fenced mined area remediated under an

EPA Cleanup Grant from 2008 to 2010. These areas are not specifically delineated and no dioxin related warning signs are posted. The remaining capped areas are located within the gun club area in the southwest corner of the park, which is fenced. Ball fields are located on the northwest side of the Registry site and additional development is planned by the city of Aurora.

Remedial Actions at Site:

Initial investigations of Baldwin Park began in October 1983. Sample results indicated the presence of dioxin at concentrations ranging from 2.7 ppb to 743 ppb, with the highest concentrations detected in discrete samples collected from exposed bags and drums. More extensive sampling was conducted in November 1984 to determine the extent of contamination. In April 1986, 30 piezometers and eight monitoring wells were installed. The groundwater was determined to flow to the west-southwest at a rate of one foot per year.

In winter 1987, EPA contractors excavated and removed about 250 yards of soil that exceeded 20 ppb dioxin. Excavated soil was transported to the EPA mobile incinerator in Verona. The excavated areas and areas showing dioxin surface contamination between one and 20 ppb were covered and capped. The cap consists of six inches of sand; a brightly-colored Visqueen liner that serves as an indicator if the cover is compromised; another six inches of sand; and six inches of topsoil. The topsoil was seeded and covered with a biodegradable erosion control mat. The city of Aurora agreed to provide maintenance and prevent excavation of the cover. To ensure that contaminated groundwater was not migrating off site, the EPA monitored groundwater for one year.

During 2001, the department conducted a Combined Preliminary Assessment/Site Investigation of the Lawrence County Mining Site, which revealed elevated levels of lead in several residential yards in the city of Aurora. As a result, the EPA conducted a Removal Action in the area and excavated about 5000 to 8000 cubic yards of soil from residential yards.

During fiscal year 2002, the department approved the use of the Baldwin Park Site as

a repository for lead-contaminated soils excavated during the Lawrence County Removal Action. The lead-contaminated soils were used in the construction of a berm, adjacent to the Gun Club on site, to reduce noise levels and shot hazards inherent with the club area's usage. Excavation of soils and construction of the berm began in July 2002, and were completed in the fall of 2002. Surface soil in the berm area contains lead at concentrations above the EPA's residential action level of 400 ppm. The leadcontaminated soils were placed at the bottom of the berm structure, covered with at least 1 foot of clean fill, and hydro-seeded to eliminate soil erosion of the cap and potential exposure to highly-contaminated soils. The city of Aurora has responsibility to maintain the berm. The existing fence was moved to restrict access to the berm.

In August 2003, the city of Aurora received approval from the department to plant trees on top of the berm for noise reduction. In March 2004, the department also approved a separate request to extend a water line in the area for the purpose of watering the trees.

In the summer of 2004, department staff met with the city of Aurora, Parks and Recreation Department to discuss plans for Baldwin Park. The city envisioned a set of walking trails and possibly fishing in some of the subsidence ponds on site. Initial Site Assessment work was performed by the department in the spring of 2005. The work characterized the mining impacted portions of the park. During the same period the University of Missouri was contracted to provide a final park plan. The park planning document included extensive development plans and detailed mapping of metals contamination. Additional sampling conducted by department staff confirmed that fish obtained from the park ponds were safe for consumption.

Reclamation work began in January of 2006, with the construction of perimeter fencing in an effort to prevent dumping and illegal ATV use in the park. Additional characterization of underground mine workings and agronomic soil qualities was conducted in the spring of 2006. The city of Aurora received an EPA Brownfields Cleanup Grant in October 2007 to remediate soils impacted by former mining

activity. Excavation work was conducted in the spring of 2009, to remove vegetation and the top layer of contaminated soil. Remaining soil was treated with high phosphate poultry litter in June of 2009, to make metals present less toxic to the human body. Post-treatment sampling was completed in November 2009, and the area was completely vegetated with native plants in the summer of 2010. The final Cleanup Grant project report was submitted to EPA in December 2010. The City plans to develop hiking trails and a fishing pond in the project treatment area. The pond area was fenced by the City of Aurora in 2011.

General Geologic and Hydrologic Setting:

The Baldwin Park Site is located on a broad, upland area characterized by very gentle slopes. The site straddles the drainage divide between the west-flowing Chat Creek and the north-flowing Elm Branch of Honey Creek.

Historically, this area has undergone some radical land-use changes that altered the site's natural features. The area near the railroad tracks reportedly was swampy at one time. However, as the area was settled, it was drained and converted to an apple orchard. In 1886, lead ore deposits were discovered, and subsequent surface and underground mining drastically altered the topography. The mining, which ceased in 1955, resulted in open shafts, pits, mill works and tailings piles. Many of the mined areas have since been reclaimed. Baldwin Park was developed sometime after 1973; thereafter, a portion of it was used as a city trash dump. Shafts were reportedly filled with tailings and in some cases with trash. Some of the remaining open shafts and pits are now filled with water.

Exposures in mine shafts reveal about 20 feet of residuum derived from the weathering of underlying bedrock. The residuum is composed of reddish-brown, cherty, silty clay. Typically, this material develops a very blocky structure and exhibits high permeability. However, the residuum at the site seems to be atypical, as evidenced by the historically high water levels and swampy conditions.

The bedrock surface is uneven. The uppermost bedrock at the site is the

Mississippian-age Burlington-Keokuk Limestone, except in the southern part of the park, where a relatively thin layer of sandstone, shales, conglomerates, and limestone cover the Burlington-Keokuk in some locations. The Burlington-Keokuk, along with underlying Mississippian-age cherty limestones, makes up the shallow aquifer in this area. This aquifer is over 350 feet thick and is used extensively for individual rural water supplies.

A confining layer separates the shallow aquifer from the deeper Cambrian- and Ordovician-age carbonates and sandstones that make up the deep aquifer. The deep aquifer is about 1,800 feet thick. Very high yields may be obtained from this aquifer. As a result, it provides public water supplies for the area.

Both Chat Creek and Elm Branch are gaining streams near the site but lose water to the subsurface downgradient of the site. The lost water recharges the shallow aquifer, and some of it is later discharged from springs. Water tracing studies have shown that water lost to the subsurface in the Honey Creek drainage emerges at Big Spring near the mouth of Williams Creek.

Public Drinking Water Advisory:

Baldwin Park is about one mile from the nearest Aurora city well. The city wells are greater than 1,000 feet in depth, each with 300 to 700 feet of casing. They draw water from the Eminence Dolomite and should not be affected by contamination from the site. The Sunset Drive-In has a well 0.9 miles south of the site. This well is only 665 feet deep, with 165 feet of casing, making it more susceptible to contamination. It draws water from the Jefferson City Dolomite.

Health Assessment:

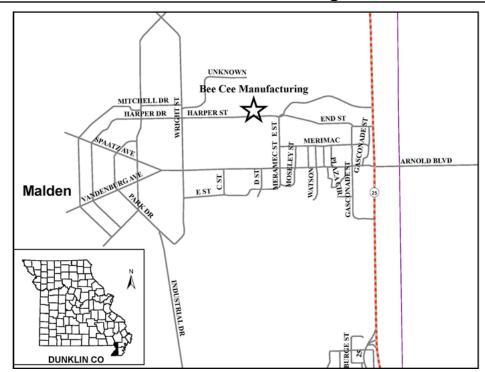
Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne) and suspected of causing soft tissue sarcoma,

non-Hodgkin's Lymphoma, Hodgkin's disease, and porphyria cutanea tarda. Routes of exposure at this site are dermal contact and ingestion of soil. The nearest residences are located along High Street, about one-fourth of a mile from the site. Population density surrounding the site is low, and until recently, there was little evidence of human disturbance.

A baseball complex was built very near the area with residual contamination, and nature trails and an archery range were added. No warning signs are visible from the developed portion of the park. Due to these factors and the increased numbers of visitors to the park, the potential for exposure to contaminants exists and is increasing. Until the site is recharacterized and more complete information is determined about the volume of residual contamination and its proximity to and accessibility by the public, this site still poses a health risk.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Bee Cee Manufacturing



Site Name: Bee Cee Manufacturing

Classification: Class 4

Date of Registry Placement: July 8, 1988

Date of NPL Listing: June 10, 1986

<u>Site Address:</u> Harper Drive, Malden Industrial Park, Malden, Dunklin County, Missouri, SE 1/4, SE 1/4, Sec. 28, T. 23N, R. 10E, Malden Quadrangle

Present Property Owner: City of Malden

Lead Agency: DNR

<u>Waste Type</u>: Metal plating process wastewater, containing hexavalent chromium

Quantity: Not determined

Site Description:

From 1964 to 1983, Bee Cee Manufacturing Company (Bee Cee) manufactured aluminum storm windows and doors on this three acre site in the city of Malden's Industrial Park. As part of its operations, Bee Cee treated aluminum moldings to clean and etch the

metal before applying a finish coat of paint. During the manufacturing process, the company dipped aluminum frames in a series of large vats that contained chemicals and rinsewater. The contents of these vats were periodically dumped onto the ground surface behind the building, where the untreated wastewater readily percolated into the sandy soil and contaminated the shallow groundwater of the area. The untreated wastewater contained chromium, aluminum. nickel, lead, fluoride and phosphates. The discharge visibly affected a 50 by 100 feet area behind the building. In 1983, Bee Cee declared bankruptcy. A removal action completed in 1992, removed contaminated soil and other debris from the site. In addition, on-site abandoned buildings were demolished and removed, and the site now has a good vegetative cover.

Environmental Problems and Areas of Concern Related to Site:

The Bee Cee Site is located in a permeable alluvial setting, where rapid movement of contaminants to the shallow groundwater aquifer is very likely. Waste migration in the groundwater is the primary concern at this site, which is listed on the U.S. Environmental

Protection Agency's (EPA) National Priorities List

Remedial Actions at Site:

After going bankrupt, Bee Cee abandoned five vats of aqueous industrial waste. Falcon Door & Window Company, a later occupant of the building, took responsibility for removing the vats. One of the five vats contained liquid hazardous waste. The contents of the other vats were not hazardous. On March 20, 1986, the vat containing the liquid hazardous waste was removed and disposed under full compliance with a Missouri Department of Natural Resources' (the department's) administrative order. The other four vats of non-hazardous material were also disposed properly.

The Remedial Investigation/Feasibility Study (RI/FS) began in November 1991. All soil sampling and limited groundwater sampling indicated chromium contamination. In February 1992, the EPA initiated a study to determine if an early removal action (source soil removal) was feasible. Coordination of efforts between the department and the EPA resulted in the EPA approving an EPA-lead removal action.

The EPA completed the removal action in the fall of 1992. The contaminated soil was removed, along with the abandoned waste remaining in tanks and vats. All abandoned buildings on site were demolished and properly disposed. The EPA, the department, the Agency for Toxic Substances and Disease Registry (ATSDR), and the Missouri Department of Health and Senior Services (DHSS) developed soil action levels of 2,000 parts per million (ppm) for total chromium and 180 ppm for hexavalent chromium. A Further Investigation of Groundwater was completed and submitted in June 1993, indicating a chromium-contaminated plume in excess of the EPA's drinking water standard, the Maximum Contaminant Level (MCL). Currently, no threat exists to public drinking water; however, a threat is posed to future use at the site.

A Record of Decision formalizing the remedial measures in the proposed plan, which includes natural attenuation and groundwater

monitoring, was signed by the EPA in September 1997. In March 1999, the Remedial Design (RD) was completed by the department. The EPA requested that the city of Malden conduct the remedial work. The city declined, citing a lack of financial means. Therefore, site work was primarily federally funded, and the state performed the remedial work.

The Remedial Action (RA) involved the installation of five additional monitoring wells in September 1999. Annual groundwater monitoring measures natural attenuation and ensures that hexavalent chromium at concentrations in excess of the action level of 18 parts per billion (ppb) is not migrating off site. The preliminary closeout report prepared by the department was signed on September 10, 1999 by the EPA. The construction completion is considered attained for this site.

In 2010, soil sampling was conducted at the Bee Cee Manufacturing site as recommended by the Second Five-Year Review. Based on the results obtained, the soil on-site remains contaminated with hexavalent chromium at levels above residential use levels, but below industrial use levels. An addendum to the site environmental covenant restricting groundwater use has been put in place limiting future site use to commercial/industrial.

In the 2014, annual groundwater monitoring, none of the wells had detections of hexavalent chromium above the site remediation goal of 18 ppb. Total chromium for all site wells was below the site remediation goal of 100 ppb.

The third sitewide Five-Year Review was finalized in June 2014. It recommended reevaluating the site groundwater cleanup level for hexavalent chromium once EPA changes the MCL, or after the site remediation goal for hexavalent chromium has been attained site-wide. It recommended that additional soil sampling be conducted on the west side of the site to complement sampling conducted in 2010, to determine if additional risk remains in that area. It also recommended that a screening-level ecological risk assessment be conducted, given that current methodologies were not used previously to assess ecological risk.

Annual sampling of site wells is expected to continue. The next Five-Year Review is scheduled to be completed in July 2019.

General Geologic and Hydrologic Setting:

The Bee Cee Site is on the east edge of the Kennett-Malden Prairie, a low alluvial terrace that parallels Crowley's Ridge. Sand and gravel up to 150 feet thick underlie the site. The highly-permeable alluvium readily absorbs the vast majority of the precipitation that falls on the site. Surface runoff occurs only during intense rainfall.

Water and other fluids introduced onto the surface would be expected to move rapidly down to the water table, which is estimated to be eight to 12 feet below the surface. The water table elevation changes seasonally on a regional scale and may be influenced locally by water supply wells and irrigation wells producing from the alluvium. The direction of groundwater movement in the alluvial aquifer is to the east-southeast.

The Wilcox Group, which consists of loosely-consolidated sands and clays, underlies the alluvium. Downward movement of contaminants is retarded by the uppermost clay layer in the Wilcox Group. Sandy intervals of the Wilcox Group may be used as a water supply, but generally are not because the alluvial aquifer is shallower and of comparable quality.

The underlying McNairy aquifer, which is tapped by some of the Malden public supply wells, has a piezometric head above the ground surface; that is, it is artesian. It is highly unlikely that contaminants from the Bee Cee Site would affect this deep aquifer.

Public Drinking Water Advisory:

The city of Malden's main city well (known as Well No. 4) is located about 1,000 feet west-southwest of the site. The proximity of the well poses little concern, because the well draws from the deep aquifer, which should be isolated from contamination due to special geologic and hydrologic conditions shown by the aquifer. The city also has three other wells that draw from the shallow, Quaternary

alluvial aquifer. These wells are located two to four miles south of the site.

Although no contamination was detected in water from the city's wells, timely cleanup of the site and routine groundwater monitoring will ensure that the wells are not affected in the future.

Health Assessment:

The following are the major contaminants of concern found at the site: chromium, aluminum, nickel, lead and phosphate. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

Possible exposure pathways include the ingestion of contaminated groundwater, direct contact with the contaminated soil, and inhalation of dust from the contaminated soil. However, the contact and inhalation routes of exposure are expected to be a minor concern. The ingestion route could be a major concern if the contamination reached the city well; however, this is not expected because the city well pulls its water from the deep aquifer that is isolated from the shallow aquifer by the relatively impermeable Porter Creek clay formation.

The area served by the Malden city water system has only a few isolated shallow wells. An initial analysis of these shallow wells and Malden City Well No. 4 showed nickel levels in a few shallow wells that were slightly above the recommended safe lifetime level. Subsequent rounds of testing on these same wells by the DHSS continue to show nickel levels below the recommended drinking water standard. No contaminants were detected in the 2005 well sampling. Sampling of monitoring wells in the area should continue to ensure that no one is exposed to unacceptable concentrations of contaminants from the site. On-site monitoring well sampling continues to find detections of total chromium below EPA's MCL.

As part of the Second Five-Year Review a site risk assessment was carried out in light of the revised toxicity and screening values

developed by EPA. Site data collected during the period 2004 through 2008 was used for the risk assessment. The current residential screening level for hexavalent chromium for domestic water is 110 µg/L, while the current residential soil screening level, based on carcinogenic risk, is now 39 mg/kg. significantly lower than the cleanup level of 180 mg/kg identified in the Action Memorandum approved by the EPA in 1992. A recommendation was made to collect more soil data to enable current assessment of the site soils. Consequently, the department developed a Sampling and Analysis Plan for the site soils. The draft was commented on and discussed with DHSS.

DHSS was also requested to conduct well sampling of previously identified domestic wells in the vicinity of the site. A search for post-1987 domestic wells of record by the Wellhead Protection Section turned up mostly irrigation wells. No suitable private wells were therefore identified for sampling purposes.

Based upon available information, no exposure is occurring at the present time. However, long-term protectiveness of the remedial action will be verified through continued monitoring of site groundwater monitoring wells.

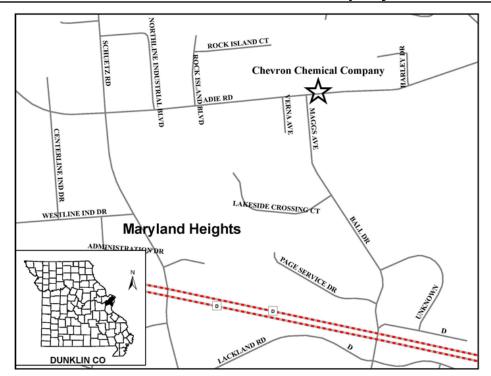
To optimize the remedy, the department recommended that sampling be discontinued in wells MW-1 and MW-2 since both wells are up gradient from the source area well MW-3. It also recommended that sampling be discontinued in wells MW-7, MW-8, MW-9, and MW-10 until the plume is detected in well MW-6 at which time sampling of well MW-7

should resume. This procedure should be followed sequentially in subsequent wells following detections.

The Second Five-Year Review in June 2009, identified revised EPA Regional Screening Levels based on new toxicity data for hexavalent chromium in soil. Since the new soil screening level is much lower than 180 mg/kg cleanup level utilized in the 1992, soil removal, additional sampling and risk evaluation were conducted. Additional soil sampling at the site indicated that hexavalent chromium concentrations were below the new industrial screening level at a 1E-05 risk level but a few were above the new residential screening level at a 1E-05 risk level. This risk has been addressed by implementing an additional institutional use control limiting use of property to industrial use, a restriction that was not included in the previous environmental covenant which addressed groundwater use only. The amended environmental covenant was signed by the City of Malden, the department, and EPA in June 2010.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Chevron Chemical Company



<u>Site Name</u>: Chevron Chemical Company

Classification: Class 4

<u>Date of Registry Placement</u>: January 6,

1984

<u>Site Address</u>: 2497 Adie Road, Maryland Heights, St. Louis County, Missouri, SW 1/4, SE 1/4, Sec. 23, T. 46N, R. 5E, Creve Coeur Quadrangle

Present Property Owner: Chevron Chemical

Company

Lead Agency: DNR

Waste Type: Pesticides and arsenic

Quantity: Not determined

Site Description:

The site is a former pesticide and fertilizer formulation plant that operated for over 30 years. Spills and leaks at the plant may have contributed to contamination. The site is located in a light industrial area in the Fee Fee Creek watershed. Fire debris contaminated with pesticides was buried on site in unlined pits in the 1950's. This area is currently

located under buildings and is not accessible. Additionally, up to 4,800 pounds of the fungicide Maneb were buried on site in 1974. A request was approved for use of the facility as warehouse space. Building space was leased to several businesses. These businesses will not impact or influence current site conditions.

This site is located in a commercial and industrial area, bordering residential areas with 3,000 people in a 0.5 mile radius. It is not publicly traveled or a public use area.

Environmental Problems and Areas of Concern Related to Site:

Pesticides were detected in soil and shallow groundwater on the plant site. In 1981, the level of groundwater contamination was as high as 2,300 parts per billion (ppb) of 2,4-D. Groundwater contamination was found at the perimeter of the site in the downgradient direction. Five private wells draw from the aquifer of concern within a three mile radius. The primary use of groundwater is to process industrial water.

The nearest down slope surface water is Fee Fee Creek, which is used occasionally for trapping furbearers.

Remedial Actions at Site:

The Chevron Chemical Company submitted soil sampling and groundwater monitoring data to the U.S. Environmental Protection Agency (EPA). The company plans to continue quarterly groundwater monitoring. Field work includes 23 on-site monitoring wells, five off-site monitoring wells, six off-site soil borings at the suspected arsenic spill, a surface geophysical survey, and 56 on-site soil borings. An abandoned sewer system at the facility was pumped of its contents in February 1987. Sampling of the runoff collected in the sewer indicated some pesticide and arsenic contamination. Surface water samples collected in March 1987, did not indicate significant levels of contamination. A sample collected from a seep below Building D indicated low levels of arsenic and pesticide contamination.

Chevron conducted a supplemental site investigation in 1989 that identified areas of on- and off-site surface soil contamination showing high levels of pesticides and insecticides. Chevron capped and paved the off-site contaminated loading area. Previous remedial actions include paving and capping contaminated on-site soils to reduce migration of contaminants into groundwater. Chevron installed 29 shallow and deep monitoring wells on their property and began conducting groundwater monitoring at the property February 1981.

During 1995, the EPA and the Missouri Department of Natural Resources (the department) concluded that groundwater would be monitored annually for a period of five years by the Potentially Responsible Party. However, annual groundwater sampling has continued past the five years and indicates that natural attenuation is occurring at the site.

A 2007 Annual Groundwater Monitoring Report indicated that 27 of 36 trends were in the downward direction for organochloride pesticides, arsenic, and volatile organic compounds (VOCs), but two VOCs (cis-1,2-DCE and TCE) increased in one test well. Annual monitoring will continue.

In a letter dated September 25, 2008, the lead

for this site was transferred from EPA to the department. Currently they sample 16 of the 29 wells on an annual basis. All samples are analyzed for organochlorine pesticides, arsenic, and VOCs.

Since 1995, trichloroethylene (TCE) has shown up in several of the monitoring wells on the former Chevron Chemical property at levels far above background and in exceedance of EPA drinking water standards. Data indicates an upwards trend in TCE contamination levels and the TCE is not related to the contaminants of concern (pesticides/herbicides) associated with Chevron's past operations. In addition, the TCE detections are highest at the most upgradient monitoring well on the Chevron site indicating the source of the TCE is likely offsite. This is an industrial area with many businesses in the nearby vicinity that could have used TCE in their operations. A Pre-CERCLIS Site Screening is being conducted in the area to try and locate the source of the TCE contamination.

General Geologic and Hydrologic Setting:

The site is underlain by 20 to 30 feet of loess, or wind-deposited, clayey silt, over Pennsylvanian shale or residual clay. A limestone unit that is part of the uppermost aquifer lies below the shale or clay at a depth of about 30 to 70 feet.

The confining unit at the base of this aquifer is the Maquoketa Shale at a depth of several hundred feet. Water from deeper horizons of the limestone aquifer may be too saline to be considered potable. The shallow part of the bedrock aquifer probably produces goodquality water; however, yields may be low. Groundwater is not used widely in this area due to the presence of public surface water supplies.

Perched water is present in the loess, but yields are so low that this is not considered an aquifer. The perched groundwater has been affected by contaminants at the site. Due to the presence of low-permeability material beneath the loess, the water within the loess is expected to discharge to the surface or to buried sewer lines downgradient of the site.

Public Drinking Water Advisory:

This area is served by St. Louis County Water Company, which uses the Missouri and Meramec Rivers as sources. Some area residents may have private wells. This site poses no threat to public water supplies.

Health Assessment:

The following are the major contaminants of concern found at the site: aldrin, arsenic, 2,4-D, dieldrin, lindane, and total xylenes. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

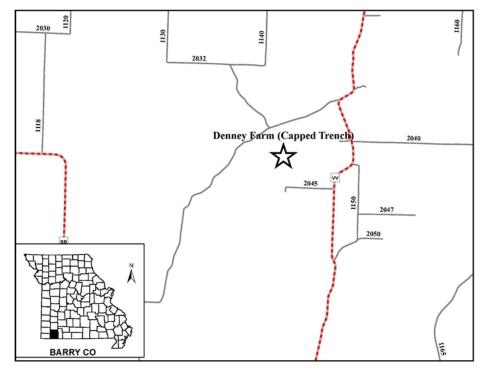
Investigations indicated the presence of soil contamination both on and off the site; however, the off-site contamination was found only in the area next to the former arsenic off-loading dock. Because these areas have been capped and paved, potential human exposure is limited. The potential for human contact with the contaminated soil on site is low because the site is fenced, secured and covered with buildings. Therefore, the

potential for exposure from airborne contaminants and surface water is expected to be low.

Exposure to the public from groundwater contamination is not expected because:
(1) The only private wells in the area are one-half mile away and up gradient from the site; and (2) down gradient areas are served by public drinking water. Based on available information, the potential for exposure to the general public and to workers on site is low; however, the owners must maintain the existing asphalt cap to eliminate potential exposure. If conditions at the site change, and exposure to contaminated soil occurs, adverse health effects could occur.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Denney Farm (Capped Trench)



Site Name: Denney Farm (Capped Trench)

Classification: Class 4

<u>Date of Registry Placement</u>: January 24, 1992

<u>Site Address:</u> Seven miles south of Verona, Barry County, west of Highway VV, Part of NW 1/4, Sec. 20, T. 25N, R. 26W, McDowell Quadrangle

Present Property Owners: James Denney

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

In 1971, about 90 drums of chemical wastes were buried in a shallow trench at this site. In 1981, the U.S. Environmental Protection Agency (EPA) excavated and removed the drums and a large quantity of contaminated soil. When excavated, the trench measured roughly 12 by 61 feet and was 5 feet deep. Soil analyses indicated dioxin contamination remained in the trench; however, due to

excavation constraints, the decision was made to cease excavation at that point and cap the trench. The total Registry area, including the capped trench and the uncontaminated buffer, is 1.5 acres. The site is located in a cattle pasture that remains well-vegetated and marked with permanent monuments. The trench is surrounded by an open field and several acres of forest.

Environmental Problems and Areas of Concern Related to Site:

Surface erosion and deterioration of the cap is a long-term concern. However, to date, the cap remains in excellent condition, and is wellvegetated with no signs of erosion.

Remedial Actions at Site:

In June 1981, about 90 drums of dioxintainted waste were excavated and removed from the trench. After the drum removal, an estimated additional 140 cubic yards of soil was removed from the trench. Both the soil and drummed waste were later destroyed on site via thermal treatment. The trench was then backfilled and capped, with some dioxin contamination remaining. An estimated 112 cubic yards of soil averaging 10 parts per billion (ppb) dioxin remains in the trench, with

a maximum level of 530 ppb remaining. The decision to backfill the trench was based on the following information from geologic and waste isolation professionals: the sides and bottom of the trench were composed of soil that was very dense and impermeable, which was substantiated by a permeability test performed by the Missouri Department of Natural Resources (the department); no joints or openings capable of transmitting water from the surface to underlying bedrock were noted; and the remaining dioxin was considered immobile and would not migrate unless transported by water percolating through the trench.

Monitoring well analyses indicated no significant pollutant loss occurred from the trench. To prevent water percolation, an impermeable cap was installed. Cap construction consisted of sloping the trench sides to allow a better seal between the natural soil and backfill material. The trench was then backfilled with low permeability clay and compacted in 6-inch lifts. An overencompassing, impermeable plastic cap was placed over the backfilled trench. This cap was constructed in four layers: a three inch sand cushion, the plastic liner, a second three inch sand cushion, and six inches of topsoil. Sod was then placed over the topsoil to prevent erosion of the impermeable cap. Monuments at the corners of the trench permanently mark the area.

General Geologic and Hydrologic Settings:

The topography around the site is characterized by valleys and ridges. The major streams have broad, flat, deeply-incised valleys, and smaller tributaries dissect the plateau surface, resulting in rugged terrain. The site sits atop a northwest-trending ridge that is truncated by the valley of Calton Creek. The site itself is nearly flat. Surface runoff drains to the northeast or southwest to small tributaries of Calton Creek. Although the section of Calton Creek nearest the site is gaining, upstream and downstream reaches and most of the Calton Creek tributaries lose significant portions of their flow to the subsurface. Due to the highly permeable nature of the surface materials and bedrock, surface runoff around the site rarely occurs.

Site soils are composed of a three foot thick layer of loamy silt, overlying 10 to 40 feet of very cherty, red, clay residuum, derived from the weathering of the bedrock. Across portions of the site, a fragipan (densely packed layer of chert fragments and clay) may exist at a depth of about three feet. This fragipan typically acts as a barrier to downward migration of water, causing seasonal or temporary perched water conditions. The underlying residuum is typically highly permeable.

Bedrock beneath the site is the Reeds Spring Formation, a very cherty limestone, which, along with the underlying Pierson Formation, represents the shallow aquifer in this area. Permeability is generally high, due to weathering and solution activity along fractures and bedding planes. Solution weathering typically produces a pinnacled bedrock surface, accounting for a wide range in the thickness of surficial materials. Solution weathering also produces karst features, such as caves, sinkholes and springs. Remnants of a Pennsylvanian-age sandstone layer are also present near the site.

Due to limited yields, the shallow aquifer primarily serves individual households. Wells requiring high yields, such as community wells, must tap the deep aquifer, which is composed of Cambrian- and Ordovician-age carbonates and sandstones. The deeper aquifer is separated effectively from the shallow aquifer by a confining unit at a depth of about 300 feet.

Public Drinking Water Advisory:

No public water systems are close to the site. Most nearby residences are served by private wells, which may be at risk due to the karst topography and permeable soil in the area. That risk should be minimal as long as the site is maintained properly to prevent migration of contaminants.

Health Assessment:

Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and

immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's lymphoma, Hodgkin's disease, and porphyria cutanea tarda.

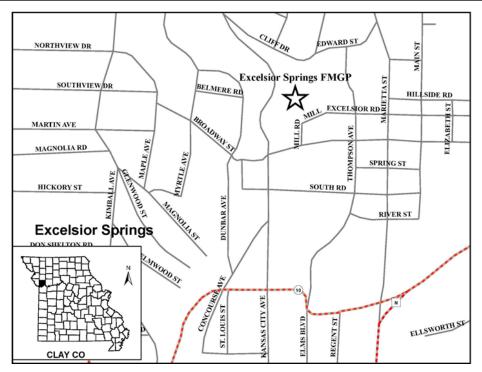
Exposure routes to the dioxin at this site may include ingestion of the contaminated soil, inhalation of contaminated dust particles, and dermal contact with the contaminated soil or dust. Surface and groundwater contamination is unlikely because of the impermeable cap.

In June of 2006, a well water sample was collected from a landowner whose property borders this site. Missouri Department of Health and Senior Services was unable to find a lab that could test for dioxin; however, we were able to test for a component found with dioxin called 2,4,6-trichlorophenols (TCP),

which is more mobile in groundwater that dioxin. No TCP was detected in the sample submitted.

Based on the available information, this site does not appear to present a significant health risk to the public at this time. The site has an adequate cap and is in a remote area. However, if the use of this site were to change, or excavation or surface grading were to occur and expose contaminated soil, exposure to dioxin-contaminated soil could occur.

Excelsior Springs FMGP



Site Name: Excelsior Springs FMGP

Classification: Class 4

Date of Registry Placement: May 6, 2003

Site Address: 320 W. Excelsior Street,

Excelsior Springs, Missouri

Present Property Owner: Excelsior Springs

Housing Authority

Lead Agency: DNR

<u>Waste Type</u>: Coal tar, which contains volatile organic compounds (VOCs) and semi-volatile organic compounds, including polycyclic aromatic hydrocarbons (PAHs)

Quantity: 1,908 tons of contaminate soil.

Site Description:

The Excelsior Springs Former Manufactured Gas Plant (FMGP) occupies about one acre in a mixed business/residential area.

Department personnel discovered the site after identifying FMGP structures on historic Sanborn Fire Insurance maps dating between 1900 and 1913. The structures depicted include a 12,000 cubic foot capacity gas

holder, a 30,000 cubic foot capacity gas holder, purifiers, a retort room and an oil tank. None of the aboveground FMGP structures remain.

Currently, the Excelsior Springs Housing Authority operates the Ruey-Anne Apartment building for low-income persons/families. Approximately 70 residents live in the building. Underground FMGP structures are located under the apartment building and immediately north and west of the apartment building.

A removal action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authority was completed in the winter of 2006.

An environmental covenant imposing active and use limitations on the site was executed in May 2008.

Environmental Problems and Areas of Concern Related to Site:

Surface and subsurface soil was contaminated with coal tar residuals. VOCs and carcinogenic PAHs were present in soil at concentrations exceeding health-based screening levels. One sample contained leachable benzene that exceeded the

Toxicity Characteristic Leaching Procedure (TCLP) regulatory limit of 0.5 parts per million making this sample characteristic hazardous waste based on toxicity. PAHs also were detected in sediment of the Dry Fork of Fishing River, however, hazardous substances were not detected in the surface water. Groundwater contamination including BTEX compounds, PAHs, and one or more RCRA heavy metal remains on-site and will monitored annually. Institutional controls have been put in place to minimize the present and future potential for exposure to contaminated groundwater.

Remedial Action at the Site:

The department completed a Pre-CERCLIS (Comprehensive Environmental Response. Compensation, and Liability Information System) Site Screening (SS) investigation in March 2000 and a Preliminary Assessment/ Removal Site Evaluation (PA/RSE) investigation in September 2000. The investigations documented coal tar residuals in surface and subsurface soil and that PAHs are present in the sediment of the Dry Fork of Fishing River. The investigations concluded that the presence of hazardous substances poses a threat to human health and the environment and that a release to surface water is suspected due to the contaminated sediment. A Removal Action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) authority, further characterization to delineate surface soil contamination, and action to minimize or eliminate exposure to contaminated soil were recommended.

The site was referred to the department's Cooperative Program to negotiate an AOC for a non-time-critical removal action with AmerenUE, the responsible party, in April 2001. AmerenUE submitted a Site Evaluation Workplan in March 2002 and performed the Site Evaluation in October 2002 without any state or federal oversight or approval of the workplan, due to failure to negotiate a mutually agreeable AOC. Because the negotiations failed, the department referred the site to the U.S. Environmental Protection Agency (EPA) for enforcement action under CERCLA. Both the EPA and the department provided comments on all past data and work

conducted without approval, along with a Risk Assessment for Residents and Employees Exposed to the Surface Soils at the Ruey-Anne Apartment building. AmerenUE has completed characterization, including sampling on-site monitoring wells, indoor-air sampling, and off-site investigation, and plans to begin Removal activities in 2005. AMEREN completed sampling in the summer of 2004.

In July 2005, AmerenUE submitted a draft Engineering Evaluation/Cost Analysis (EE/CA), which included a workplan for remediating the site. The revised final EE/CA was approved by EPA in the fall of 2005. On January 18, 2006, the EPA signed an Administrative Settlement Agreement and Order on Consent for Removal Action (RA) at the Excelsior Springs FMGP site.

Removal action activities at the site were completed during February 2006. A total of approximately 1900 tons of soil and source material were excavated and removed from the site, from the area around the eastern gas holder, western gas holder and a relatively small isolated area north of the western gas holder. Clean backfill was placed in each excavation area. Because much of the footprint of the eastern gas holder lay under a walkway extending from the Ruey-Anne Apartment building, impacted soil columns beneath each piling were necessarily left in place. Surface restoration was conducted in April and May 2006.

AmerenUE prepared a post-removal action Human Health Risk Assessment (HHRA) in the spring of 2006. Due to contamination remaining in place, the City of Excelsion Springs was required by city ordinance to enter into a Memorandum of Understanding (MOU) with the department to ensure that appropriate institutional controls are in place that restrict the use of groundwater for a potable drinking water supply. The EPA developed a restrictive covenant for the site to address contaminated soil left in place after the removal action. The restrictive covenant satisfies the requirements of the Missouri Uniform Environmental Covenants Act, and restricts the use of groundwater and soil excavation in specified areas at the Excelsion Springs FMGP site. The department is the grantee in the restrictive covenant.

Both the MOU and the restrictive covenant were in place in the spring of 2008.

The RA Completion Report was approved in February 2009. EPA sent a Notice of Completion to AmerenUE in March 2009.

General Geologic and Hydrologic Setting:

The site is located within the Dissected Till Plain section of the Central Lowlands physiographic province. Topography in this region consists of moderately dissected plains. The region consists of Quaternary alluvium and glacial material deposited over Pennsylvanian-age sedimentary rock.

Unconsolidated deposits at this site consist of three to six feet of fill over silty to sandy clay interbedded with clay and gravelly clay alluvium developed from the Dry Fork of the Fishing River. The uppermost bedrock, the Pennsylvanian-age Pleasanton Group, is composed of interbedded shale and limestone. This bedrock unit ranges from six to 36 feet, slopes to the northwest, and has an average thickness of approximately 60 feet.

An unconfined water-bearing zone is present within the unconsolidated overburden materials, with flow direction to the southwest. The depth to groundwater ranges from five to eight feet below ground surface. The uppermost bedrock aquifer is hosted in sandstones of the Pleasanton Group. Municipal drinking water for the city of Excelsior Springs is obtained from public water-supply wells from the Pennsylvanianaged sediments of the Pleasanton, Marmanton and Cherokee groups, and Ordovician-aged sandstone of the St. Peter Sandstone.

Public Drinking Water Advisory:

The city of Excelsior Springs receives its drinking water from alluvial wells five miles south of the city. The public water supply is not affected by this site. The Hall of Waters bottles water from the on-site spring in down town Excelsior Springs. This bottled water is not regulated or tested by the Public Drinking Water Program (PDWP). The PDWP no specific information that indicates local springs are impacted by the site. In general, spring

water is considered to be susceptible to shallow groundwater contamination. Excelsior Springs markets its bottled water to the public as having health benefits, and the city relies on the image of its springs to draw tourism.

Health Assessment:

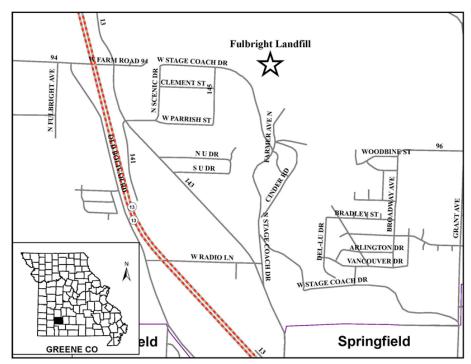
The following are the major contaminants of concern found in soil, sediment or shallow groundwater at the site: benzene, naphthalene, toluene, xylene, arsenic, mercury, selenium, silver, cyanide, cadmium, chromium, barium, and 16 chemicals collectively grouped into the PAHs. Among those PAH's found are potential human carcinogens including benz(a)anthracene. benzo(b)fluoranthene, benzo(l)fluoranthene, benzo(k)fluoranthene, benzo(a)pyrene, and indeno(1,2,3,-c,d)pyrene. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential health effects associated with these contaminants.

The Department of Health and Senior Services (DHSS) conducted a health investigation in 2000 to determine the potential health risks associated with the site. The potential exposure pathways on and off the site are dermal contact, incidental ingestion, and inhalation of metals, PAH's and VOCs found in soil.

Between 2000 and 2005, AMEREN UE conducted a site investigation to determine the potential risk of exposure to on- and offsite groundwater, and surface water and sediment in the Dry Fork of the Fishing River. Potential risk to human health associated with exposure to soil prompted soil removal. According to a HHRA, dated May 2006, risk associated with exposure to contaminants in soil for residents and workers after the remediation are within the EPA acceptable cancer and non-cancer risk ranges. This includes risk associated with contaminant vapors migrating from soil into the Ruey-Anne Apartments. Risk for domestic use of shallow groundwater was not estimated for on-site future residents or workers or for adjoining properties. Only risk associated with incidental contact with groundwater during future construction was estimated to be within

EPA's acceptable risk range. Human consumption of groundwater is being prohibited on the property through groundwater use restrictions placed on the property deed. For off-site groundwater contamination south of the property, similar restrictions are being sought.

Based on available information, risk associated with exposure to soils, sediment, and surface water is within EPA's acceptable limits. On- and off-site groundwater use restrictions will minimize potential risk associated with contaminants in the groundwater.



Site Name: Fulbright Landfill

Classification: Class 4

<u>Date of Registry Placement</u>: January 15,

1984

Date of NPL Listing: September 8, 1983

Site Address: Highway 13, north of the Springfield, Greene County, city limits. Adjacent to an inactive northwest sewage treatment plant on Bolivar Road SE 1/4, Sec. 35, SW 1/4, SW 1/4, Sec. 36, T. 30N, R. 22W, and NE 1/4, NE 1/4, NE 1/4, Sec. 3, T. 29N, R. 22W, Ebenezer Quadrangle

Present Property Owner: City of Springfield

Lead Agency: EPA

<u>Waste Type</u>: Cyanide, acids, plating residues (cadmium and chromium), heavy metals, trichloroethylene (TCE), paint, waste oil, and pesticide (pyrethrum) residues

Quantity: Not determined

Site Description:

Fulbright Landfill is located in the South Dry

Sac River flood plain just north of Springfield. The city of Springfield operated the landfill from 1962 to 1968, to dispose of municipal and local industrial waste. In 1967, one person died from cyanide poisoning while unloading incompatible wastes at the landfill sludge pit. Another person was nearly overcome by fumes while covering the sludge pit.

The landfill is located east of Highway 13 and close to the Sac River Landfill. The U.S. Environmental Protection Agency (EPA) has addressed monitoring of both landfills as a single site.

Environmental Problems and Areas of Concern Related to Site:

The Fulbright Landfill is located on the flood plain of a tributary to the Little Sac River. The Little Sac River is a tributary of Stockton Lake, a major recreational and fishing resource. The site is located near, but downgradient from, Fulbright Spring, a large spring that is a source of drinking water to the city of Springfield. Residences within 1,000 feet of the site use groundwater as a source of drinking water, but the drinking water has remained unaffected by the previous contamination. A Springfield city police

shooting range is located near the landfill.

Remedial Actions at Site:

On March 13, 1986, the EPA issued a Consent Order under Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to the city of Springfield and other Potentially Responsible Parties (PRPs). The Consent Order required the PRPs to conduct a Remedial Investigation/Feasibility Study (RI/FS) for both the Fulbright Landfill and the adjacent Sac River Landfill under the oversight of the EPA. Both were municipally-operated solid and industrial waste landfills.

The Geophysical Investigation Report was released in June 1986, and used for final revisions in the design of the groundwater monitoring network of the RI. The PRPs began installation of the monitoring wells in July 1986. The PRPs completed sample collection and analysis in May 1987. Two rounds of environmental samples were collected. A series of 22 monitoring wells were installed in both the alluvium and shallow bedrock during the RI.

In April 1988, the EPA completed its review and released the Remedial Investigation/ Endangerment Assessment report for public comment. The FS for the site was completed and approved by the EPA and the Missouri Department of Natural Resources (the department).

Based on findings of groundwater monitoring and other investigations in the RI, the EPA signed a Record of Decision (ROD) selecting remedial actions for the Fulbright and the Sac River Landfills in September 1988. Remedial actions for the site consisted of the following:

- Drummed wastes in a sinkhole above the Fulbright Landfill were excavated, tested, treated or disposed of as appropriate. The area was then capped and vegetated.
- 2. Deed restrictions were placed on the property, controlling future uses.
- 3. Groundwater and surface water samples from the site are being collected and analyzed on a regular basis as part of a

long-term monitoring plan.

4. A contingency plan was developed for leachate control if leachate is noted to be a significant or continuing problem.

The EPA and the PRPs negotiated a Consent Decree, effective in February 1990, for the performance of the above remedial actions. The drum removal at the Fulbright sinkhole was completed in fall 1990. Sampling of soils in the sinkhole indicated no significant residual contamination. The sinkhole was backfilled and reseeded.

In early 1993, an RI was conducted at the adjacent North U Drive Site. During the North U Drive RI, the groundwater levels in the deep aguifer were noted to fluctuate dramatically over short periods of time corresponding to variations in pumping rates at the nearby Fulbright pumping station. This localized, but dramatic, effect on the deep aquifer caused the department to suspect that groundwater beneath the Fulbright Landfill may also be affected by pumping at the Fulbright pump station, which pumps as much as 3,000,000 gallons per day. Of particular concern was the potential that groundwater no longer flowed away (northwest) from the Fulbright pump station but flowed toward the Fulbright pump station.

At the department's Hazardous Waste Program's request, the Division of Geology and Land Survey (DGLS) investigated groundwater beneath the Fulbright Landfill to evaluate this potential problem. The EPA funded the study, and the DGLS completed a final hydrogeologic investigation report of the Fulbright area in fiscal year 1995. The report concluded that the possibility exists for contamination from the shallow aquifer to reach the deeper aquifer and Fulbright Well No. 1, a part of the city of Springfield's public water supply. The DGLS report recommended installation of a shallow monitoring well and the use of a deep well, Fulbright Well No. 2, as an early warning system to indicate contaminant migration toward Fulbright Well No. 1.

From 1998 to 2000, the city conducted water level and chemical monitoring at the new well. Results indicated that the shallow aquifer was

not contaminated. Water level measurements conducted during startup pumping of the city's production well were inconclusive with respect to the connection of the shallow aquifer to the deep, Ozark aquifer. The city conducted a second pump test on Fulbright Well No. 1, similar to the pump test conducted the previous year, and the water level in the upper aquifer went up. This is a very unusual hydrogeologic phenomenon, but one that has been documented in other locations and at this site during 1997.

Unlike the 1997 pump test, during the 1998 pump test, water levels in the upper aquifer decreased through time while pumping the lower aquifer. The department was concerned that this may indicate a connection between the two aquifers.

In 2002, the pump test was repeated prior to shutdown of Fulbright Well No. 1 in order to conclusively ascertain a hydraulic connection between the upper contaminated aquifer and the lower aquifer as influenced by Fulbright Well No. 1. The results of this test indicate that a hydraulic connection does not exist to the extent that contaminated groundwater could migrate into the deeper aquifer and contaminate Fulbright Well No. 1. The completion of this test satisfies the outstanding concerns from the department.

Shallow groundwater data indicates that most volatile organic compound concentrations are decreasing. However, in one deep well, TCE concentrations increased to 1,700 parts per billion (ppb) in 2009. TCE concentrations in this well tend to fluctuate between 400 and 1500 ppb on a regular basis.

The city of Springfield has completed a stream bank stabilization project for the South Dry Sac River along the Fulbright Landfill to prevent the stream from eroding into the landfill and to address a leachate seep along the bank.

The city of Springfield voluntarily remediated the leachate seep and exposed trash to ensure that the public water supply would not be impacted. The city excavated the exposed trash along the bank and stabilized the area. Large volumes of leachate were not encountered during this action. A monitoring

well was installed that will detect the potential for contamination of the deeper aquifer from shallow, contaminated zones.

In 2005, along with Sac River Landfill, the site was entered into the EPA's Ready for Reuse Initiative. The City of Springfield owns both landfills. The city has worked on stream bank stabilization and has planted many trees and shrubs to help further stabilize the banks. The two landfill sites will be used as recreational areas and complete a "greenway" corridor between two existing city parks. Institutional controls are being revised to allow limited recreational use. In preparation for this reuse, the city has constructed foot trails on the top of the caps of the landfills. Other recreational activities are likely to be added in the near future.

The EPA has completed the fourth Five-Year Review of the remedial action addressing both Fulbright and Sac River landfills, and found that the remedial action continues to be protective. The fourth Five-Year Review was finalized in September, 2010. In accordance with recommendations from the fourth Five-Year review, a fence was erected around the former cyanide pit and exposed debris was removed from the landfill in 2013.

General Geologic and Hydrologic Setting:

The site is located on the flood plain of the South Dry Sac Creek. The creek is gaining or begins to gain near the landfill. Soils consist of permeable alluvium. Bedrock is composed of Burlington Limestone.

If hazardous materials were deposited in this area, it is likely the leachate developed from these materials is migrating with the shallow groundwater into the river. Because of the relatively rapid interchange between water within the alluvial gravels and surface flow in the stream channel, the water quality of the stream could be considerably affected. It is not believed that a significant amount of leachate has entered the bedrock groundwater system.

Public Drinking Water Advisory:

Fulbright Spring, one source of Springfield's water supply, is about 2,000 feet uphill and

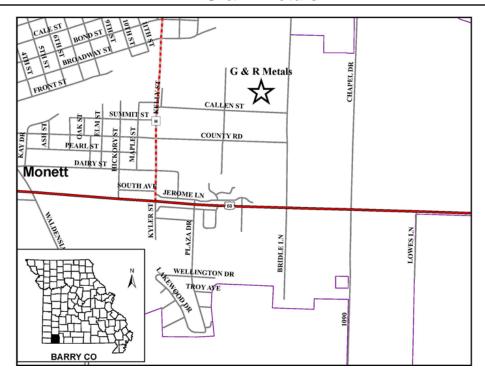
upgradient from the site. A deep public drinking water well adjacent to Fulbright Spring is currently pumping up to 3,000,000 gallons per day. Many private wells are within 0.5 miles of the site. Although no releases have been observed, the site is of concern and is a potential threat to nearby water systems due to the hydrogeologic conditions of the Springfield area.

Health Assessment:

The following are the major contaminants of concern detected in the Fulbright Landfill monitoring well system: barium; chromium; cyanide: 1,2-dichloroethylene; trans-1,2dichloroethylene; lead; manganese; nickel; trichloroethylene; and vinyl chloride. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants. The Missouri Department of Health and Senior Services (DHSS) has collected water samples from private wells around the Fulbright Landfill from 2002-2012. None of the wells showed contamination by volatile organic compounds above the EPA's Safe Drinking Water Standard. These wells will continue to be monitored by DHSS.

The city of Springfield, through a contracted environmental firm, is currently sampling the

surface water of the rivers that come into immediate contact with the Fulbright Landfill. These samples are collected and reported on an annual basis. Sample results show that ingestion of or dermal contact to surface water is not a threat to public health. During the 2009 annual registry site inspection, it was noted that leachate from the landfill is being discharged into the nearby creek at several locations. Monitoring efforts conducted by the city of Springfield or the DHSS should continue to determine the potential for human exposure to the wastes from the landfill.



Site Name: G & R Metals

Classification: Class 4

Date of Registry Placement: August 17,

1989

<u>Site Address:</u> Monett Industrial Park, one-half block east of the intersection of Callan and Industrial Streets on the north side of Callan Road. Portions of the NW 1/4, SE 1/4, Sec. 32, T. 26N, R. 27W, Barry County, Missouri, Monett Quadrangle

Present Property Owner: Wintech

Properties, LLC

Lead Agency: DNR

Waste Type: Cadmium, chromium and

cyanide

Quantity: Not determined

Site Description:

From 1969 to 1976, the G & R Metals Company operated a metal finishing and plating business on this site. G & R used a 6to eight acre lagoon on the property as an impoundment for cyanide- and cadmiumcontaminated waste waters discharged from its production processes. The lagoon was constructed without a permit or geologic evaluation and reportedly had a leakage problem. G & R ceased doing business in the fall of 1976. The sides of the lagoon were subsequently pushed in and the area leveled.

The land surrounding this site is primarily an industrial park. Many small industries, primarily light manufacturing, exist in the area.

Environmental Problems and Areas of Concern Related to Site:

The most significant environmental problems are the potential off-site transport of contaminated soil by surface erosion and potential leaching of contaminants into the local shallow groundwater supply.

Remedial Actions at Site:

The contaminated sludge lagoon was closed and backfilled in 1976. Monett Industrial Development Corporation (MIDC) applied to the Missouri Department of Natural Resources' (the department) Brownfields Voluntary Cleanup Program (BVCP) and was accepted in January 1997. A monitoring well was drilled to sample the uppermost aguifer

below the site for metals contamination prior to approval of a proposed cap over the site. In 1997, no contaminants were detected above drinking water standards; however, cyanide was detected above background levels at a depth of 40 feet. In February 2000, sampling of the monitoring well indicated a dissolved lead concentration in the groundwater above drinking water standards. The department requested further sampling to investigate lead levels in the groundwater. Additional groundwater samples have had no further contamination detected above standards.

The remedial action plan, prepared by MIDC and approved in 1999, proposed the installation of a cap with an impermeable clay liner. Surface sampling was done to determine the required area of coverage of the cap.

Contaminated soils were scraped off a large area of the site and consolidated in a smaller area. Verification sampling showed that the scraped areas are below BVCP commercial and industrial levels for chromium, cyanide and cadmium. After surveying the consolidation area, an engineered cap made of compacted clay was placed over the contaminated soil. The cap will prevent direct exposure to humans and the environment and will prevent infiltration of rainwater so that groundwater will not be affected by the contamination.

Closure of the site was completed under the BVCP in 2001. The cap was covered with a compacted gravel driving surface. A change of use request to use the capped area for an industrial parking lot and storage area was approved in 2002. A survey delineated the capped area and installed barriers. A restrictive covenant was filed in the property chain of title to prevent disturbance of the cap. The Registry area was reduced to the portion of the site containing the capped waste and is designated with permanent markers.

General Geologic and Hydrologic Setting:

The land surface at the site gently slopes to the north-northwest toward Kelly Creek, which is about 200 feet from the site and 35 to 40 feet lower in elevation. Kelly Creek carries water only after heavy rains, generally losing all of its flow to the subsurface.

Bedrock is composed of highly-weathered, cherty limestone. The overlying residuum formed from this weathering is a very cherty, red clay that has a moderate to high permeability. The residuum is 50 to 70 feet thick. Solution-enlarged fractures and bedding planes within the bedrock allow for rapid recharge of the shallow aquifer.

The shallow aquifer is made up of cherty limestone, which provides a source of water for domestic wells in the area. It is susceptible to contamination from the site. The shallow aquifer is separated from the deeper aquifer by a confining layer, which is present at a depth of greater than 300 feet. The city of Monett draws its water supply from the deeper aquifer. Groundwater flow in both aquifers is expected to be toward the west.

Public Drinking Water Advisory:

The 13 active and four proposed wells for the City of Monett are located within two miles of the site.

The nearest city well (No. 14), 0.25 miles southwest of the site, is 1,600 feet deep with 555 feet of casing. Well No. 13, 0.5 miles away, is 1,420 feet deep and has 500 feet of casing. Both are constructed into the Potosi Formation.

A well serving Ma & Pa's Restaurant is located 0.5 miles southeast of the site. This well is drilled to a total depth of only 187 feet.

Shallow groundwater is susceptible to contamination from the surface. The deeper aquifer, from which the city draws water, is less susceptible.

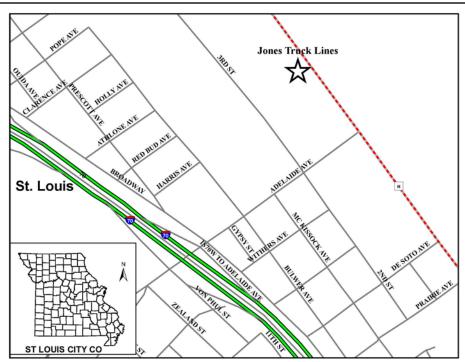
Health Assessment:

Long-term low-level exposure to cadmium may cause kidney damage, kidney stones, skeletal effects, and possibly high blood pressure. The liver, testis, immune system, nervous system and blood may also be affected. High amounts of cadmium may cause stomach irritation leading to nausea, vomiting and diarrhea. Exposure to excessive

amounts of cyanide may cause weakness, headache, confusion, nausea and vomiting. Large doses of cyanide may cause loss of consciousness, cessation of respiration and death. The highly permeable soils and karst topography of this area make the leaching of chemicals from this site into the shallow aquifer a possibility. Leaching of chemicals off site is a health concern due to the possible contamination of area groundwater. However, a door-to-door survey failed to locate any private water wells around the site.

A monitoring well placed down gradient of the lagoon showed a lead level of 31 parts per billion (ppb), twice the U.S. Environmental Protection Agency's (EPA) drinking water standard, the Maximum Contaminant Level. However, subsequent sampling found no further contamination above health standards. Quarterly monitoring was discontinued. Wintech, the company that owns this site, is

using part of the site to store completed components, or as a company waste dump. Based on available information, the site appears to present little health risk in its current condition. Soils containing high levels of metals were consolidated and placed under a clay cap. Soils remaining in other areas of the site are below occupational levels of concern. As long as the site is not developed residentially and the cap is properly maintained, the site should not present a health risk.



Site Name: Jones Truck Lines

Classification: Class 4

<u>Date of Registry Placement</u>: January 1, 1984

<u>Site Address:</u> 5601 Hall Street, St. Louis, Missouri, T. 46N, R. 7E, Granite City Quadrangle

Present Property Owner: Midwest Systems,

Inc., St. Louis, MO

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

Following its use as a municipal waste landfill from 1953 to 1965, Jones Truck Lines operated a truck terminal on site. The site was sprayed with dioxin-contaminated oil as a dust suppression measure in the early 1970's. Jones Truck Lines has moved to a new location, and the site is currently being used to park school buses. The contaminated areas are capped with asphalt. The entire site is fenced, except for a small area found not to

be contaminated. The site is gated and a "no trespassing" sign posted.

Environmental Problems and Areas of Concern Related to Site:

The site is surrounded by other truck terminals and bordered on the rear by a railroad yard, where most of the surface runoff goes.

Remedial Actions at Site:

In 1974, the front half of the lot was paved. In 1978, the remainder of the lot was paved except for about two percent of the total area. In 1994, the U.S. Environmental Protection Agency (EPA) characterized the site to determine the full extent of dioxin contamination.

This site is one of 27 eastern Missouri dioxin sites subject to a Consent Decree entered in Federal District Court on December 31, 1990. The on-site buildings were decontaminated. In accordance with the Consent Decree, a thermal treatment unit was constructed at Times Beach and used to treat dioxin-contaminated soils from this site.

From October 16, 1995, to November 28, 1995, the EPA performed an excavation of all dioxin greater than 20 parts per billion (ppb)

and transported the materials to Times Beach to be incinerated. A total of 3,635 tons of soil was excavated from the site. Soil is contaminated with dioxin at concentrations up to 20 ppb. The site was capped and the property owner will be required to maintain the cap in perpetuity. During 1999, the property owner hired a contractor to perform Underground Storage Tank (UST) closures for two USTs that were closed in place due to the presence of dioxin directly over the former USTs. The asphalt cap over the majority of the site is in good condition. The area over the USTs was not capped adequately; therefore, the Office of the Attorney General contacted the company in July 1999 to urge the completion of the cap in this area. The cap is now complete.

In September 1999, ownership of the site changed to Midwest Systems Inc. of St. Louis, Missouri.

General Geologic and Hydrologic Setting:

The site is located on the western edge of the Mississippi River flood plain. Much development has occurred in this area, with many alterations of the natural setting. The thickness of the fill material is unknown; however, due to the age of the site, the majority of ground surface settling has probably already occurred. The asphalt cover restricts surface water infiltration.

The alluvial material beneath the site is composed of clay- to sand-sized particles. The alluvium is expected to be less than 45 feet thick. The direction of groundwater movement is toward the river, where it is eventually discharged. Due to the industrialized nature of the area, some contamination of the alluvial waters is probable, but identification of a specific source would be very difficult. It may take several years for any contaminants present in the shallow groundwater system to discharge to the river.

Bedrock under the site is Mississippian-age limestone. At this location, the Mississippian limestones are not favorable for the development of drinking water wells, since

high total dissolved solids render the water unusable for most purposes.

Public Drinking Water Advisory:

This area is served by St. Louis City Water Department, which uses the Missouri River and the Mississippi River as sources. The site poses no threat to the public water supply.

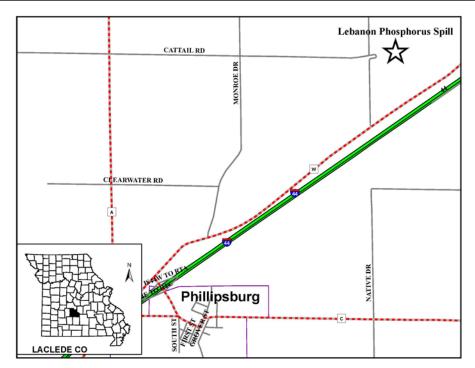
Health Assessment:

Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It also is suspected to cause soft tissue sarcoma, non-Hodgkin's lymphoma, Hodgkin's disease, and porphyria cutanea tarda.

As long as site remains capped and the cap is maintained in perpetuity as required, there are no complete exposure pathways. According to the department's 2009 annual registry site inspection, the condition of the overall lot was reportedly in bad condition due to several potholes throughout the property. However, according to the owner, the parking lot was slated for repair sometime during summer. The annual inspection in 2010 rated overall condition of the lot as bad due to the presence of several potholes throughout the property.

Potential exposure routes to dioxin at this site include ingestion of contaminated soil, inhalation of contaminated dust particles, or dermal contact with contaminated soils, dust or surface water. If excavation was to occur and contaminated soil became exposed, this could pose a health threat.

Lebanon Phosphorus Spill



Site Name: Lebanon Phosphorus Spill

Classification: Class 4

Date of Registry Placement: July 1, 1985

<u>Site Address</u>: Two miles northeast of I-44 and W Highway, east on gravel road alongside tracks for 200 feet past Huben railroad marker, Laclede County, SE 1/4, SW 1/4, SW 1/4, Sec. 12, T. 33N, R. 17W, Phillipsburg Quadrangle

<u>Present Property Owner</u>: Burlington Northern Railroad / San Francisco Railway Company

Lead Agency: DNR

Waste Type: Red and yellow phosphorus

Quantity: 5,000 gallons in buried railcar

Site Description:

The Lebanon Phosphorus Spill Site resulted from the August 13, 1972, derailment of a Frisco freight train, now Burlington Northern Santa Fe (BSFN) about two miles northeast of the town of Phillipsburg. The wreck caused

spillage of portions of two tank cars of "red and yellow" phosphorus, another car described variously as soda ash or 12-12-12 fertilizer, one car of "mineral wool" and one car of wooden ties. The wreck resulted in a fire, fueled by the phosphorus that ignites on contact with air. One of the 10,000-gallon phosphorus cars was completely burned, while the other car was only half burned, leaving about 5,000 gallons of liquid; the percentage of phosphorus unknown.

Both of the tank cars were buried on site. The site is located in an upland setting just north of the railroad tracks and east of the county road. No residences are in the immediate vicinity, and land use is agricultural.

Environmental Problems and Areas of Concern Related to Site:

Fish kills occurred at two lakes downstream from the spill site in late November 1972. At the time of the spill, a path of dead vegetation was noted from the burial site to the nearest water course. Areas of stressed vegetation occur on the east and west sides of the cap. The cap remains in good condition. Local shallow groundwater near the site is potentially contaminated.

Remedial Actions at Site:

In August 1972, the two tank cars were buried on the property adjoining the railroad property in order to extinguish the phosphorus fire, which combusts on contact with air. The burial site was capped with an asphalt pad. A stone marker, warning not to drill or dig, was placed on top of the pad. Over the years, the asphalt cap began to deteriorate and crumble. In early 1988, the owners installed a new cover at the site. The cover consists of a sand layer covered by five ounce polypropylene, then covered by an 18-mil mirafi-coated fabric. Later in the year, the fabric cover was damaged and cut open as a result of someone driving on it.

During October 1988, BNSF constructed a four inch thick concrete pad over the site. The concrete pad measures about 60 by 90 feet and is graded slightly to prevent ponding of water. Sections of steel pipe were placed around the perimeter of the pad to prevent vehicles from driving on it.

A 1998 Missouri Department of Natural Resources' (the department) inspection of the concrete cap indicated the cap was in good condition, but some minor cracks with grass growing in them were noted. Also, several steel posts had been bent by vandals on the south side of the cap, but access to the cap still appeared to be restricted. The concrete monument indicating not to dig in the area remained in place and in good condition. The 2001 inspection indicated that the cracks in the cap had been sealed.

Sampling conducted in 1994, 1996 and 1999, by the department and the Missouri Department of Health and Senior Services (DHSS), revealed no evidence of contamination above the drinking water standards in any of the tested wells.

BNSF conducted subsurface sampling at the site on June 6, 2000, to determine if contaminant migration has occurred. Sample results indicated that most of the phosphorus levels in the soils near the pad were within normal levels for agricultural soils in Missouri. Three soil samples contained higher concentrations of phosphorus, which BNSF believes may represent isolated remnants of

the original release. The concrete cap was repaired and resealed as a preventative measure to ensure its continued effectiveness. New fencing, of sufficient height to discourage vandals, has been established around the perimeter of the cap.

On September 25, 2013, a BNSF maintenance-of-way (MOW) crew excavated soil beneath a mainline track as part of routine track maintenance, which is adjacent to the Lebanon Phosphorus site. The excavated soil was stockpiled approximately 50 feet northwest of the concrete pad). The MOW crew observed intermittent small wisps of smoke coming from the stockpiled soil.

On September 26, 2013, the environmental contractor responsible for the annual sealing of the concrete pad observed smoke coming from a single location in the soil stockpile and reported this to the BNSF Manager Environmental Remediation. The stockpiled soil was located near trees; therefore, BNSF requested that Compliance One move a portion of the soil to an area onsite that was not near vegetation. During the movement of the soil, the contractor observed small, intermittent wisps of smoke. It was assumed that the material releasing the smoke was yellow or red phosphorus reacting with oxygen in the air. After a portion of the stockpile was moved, a construction fence was placed around the stockpile to limit access by unauthorized personnel. Plastic sheeting was placed over the soil and silt fence was placed around the stockpile to limit migration of the soil via stormwater runoff. The volume of phosphorus in the soil is estimated to be a very small percentage of the soil stockpile. based on visual observations made by the MOW crew and by Compliance One staff.

On October 7, 2013, a letter outlining their proposed plan to handle the soil stockpile at the Lebanon Phosphorus was submitted. On November 21, 2013 the work plan prepared for the management of the soil stockpile at the BNSF Lebanon Buried Rail Car Site was submitted to the department. DHSS requested a Health and Safety Plan (HASP) be submitted since it wasn't originally included in the workplan. It stated in the workplan it would be made available upon request. On December 6, 2013 the HASP was submitted

for the work plan as requested. On February 3, 2014, the contractor submitted a new HASP. The Registry comments to the workplan were discussed with the contractor and an email.

The contractor conducted the work to address the contaminated stockpile soil at the site starting in April of 2014. The final grading and seeding of the stormwater berm was completed in September 2014. A final report will follow.

General Geologic and Hydrologic Setting:

The site is located in an upland setting.
On-site soils are composed of stony and sandy clay residuum. Bedrock is composed of sandstone, chert and dolomite of the Roubidoux Formation. The downstream area is characterized by numerous karst features, such as sinkholes and losing stream segments.

The residual soils in which the tank cars are buried are expected to be highly permeable at depth. Leakage from the tank cars could flow through the gravel and enter surface water at Jacob's Lake downgradient of the site. The potential also exists for downward vertical migration of contaminants directly into groundwater supplies. Any surface discharges ultimately enter groundwater supplies through the losing drainage downstream of Jacob's Lake. Regional groundwater supplies could be affected if substantial wastes were to be released in a single event.

Public Drinking Water Advisory:

Laclede Co. PWSD #1 drilled a well in 1998, less than a half mile south of the spill site. The well is cased to a depth of 600 feet. Four other public wells are located within one to three miles of the spill site. All of these wells are deep and adequately constructed to minimize the possibility of contamination.

Health Assessment:

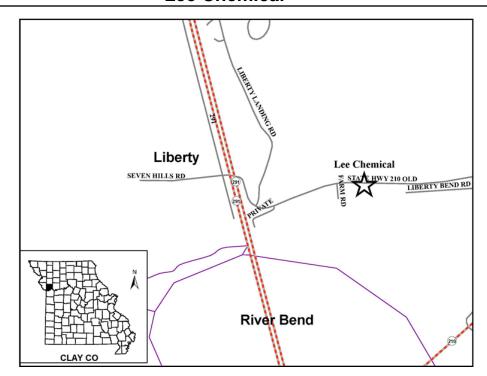
The following are the major contaminants of concern found at the site: nitrogen (nitrate), white phosphorus and phosphate. Please refer to the Health Assessment Chemical

Table in Appendix A for a description of the potential adverse health effects associated with nitrate and white phosphorus. Excess phosphorus in groundwater can produce bone development-related disorders. Three forms of phosphorus were spilled at the site; vellow. red, and a constituent of soda ash containing phosphates. Yellow phosphorus is a form of white phosphorus that contains impurities. The white phosphorus component is toxic. reacting violently when exposed to air or elevated temperatures. Red phosphorus does not usually represent a significant health hazard. It is essentially non-volatile, insoluble in water, and poorly absorbed into the body. Disassociation by-products for both white and red phosphorus reactions may include phosphine, a short-lived but toxic gas commonly used in pesticides, and relatively non-toxic inorganic phosphorus compounds.

As for phosphate, excess concentrations in groundwater may occur from leaching the disassociation by-products of red and white phosphorus, and that present in the soda ash. Because the phosphorus disposed at this site is buried, capped and marked, the only possible route of exposure would be through contaminated groundwater supplies. However, if this site were altered, direct contact or inhalation of vapors from the oxidation of the phosphorus could occur. Based on available information, no current health threat exists from this site. Because of the highly explosive nature of phosphorus when it comes in contact with air, the hazards associated with removal outweigh the possible health effects of allowing the material to remain buried.

In 2011, two wells were analyzed for total phosphorus, filtered and unfiltered. The two wells had detects of 16 ug/L and 17ug/L. This exceeded EPA's threshold for drinking water for white phosphorus of 0.7 ug/L. White phosphorus could not be ruled out at that time. In 2013, DHSS decided to sample specifically for white phosphorus, which is the most toxic component of the phosphorus's. Only one location agreed to be re-sampled (the other owner passed away) and the analysis for white phosphorus was non-detect.

The DHSS still recommends continued monitoring of groundwater (for phosphorus, chloride, pH and TDS) to ensure that off-site movement of contaminants does not adversely affect public health.



Site Name: Lee Chemical

Classification: Class 4

Date of Registry Placement: January 1,

1984

Date of NPL Listing: June 10, 1986

<u>Site Address</u>: South of old Highway 210 and north of the railroad tracks, about 0.7 miles east of Highway 291 in Clay County, Missouri, NE 1/4, SW 1/4, Sec. 28, T. 51N, R. 31W, Liberty Quadrangle

Present Property Owner: City of Liberty

Lead Agency: DNR

<u>Waste Type</u>: Trichloroethylene (TCE) and other volatile organic compounds (VOCs)

Quantity: Not determined

Site Description:

The Lee Chemical site, which occupies about 2.5 acres, is located in a rural industrial area on property owned by the city of Liberty since the early 1900s. The city of Liberty's water treatment plant was located on the property

from 1920 until 1962. The Lee Chemical Company leased the property from 1965 to 1975, packaging and distributing commercial and industrial cleaning solvents and other chemicals. Lee Chemical abandoned the property in 1975, and the building has since been removed. TCE and other VOCs once stored on-site were discovered in a city of Liberty municipal raw water supply.

Environmental Problems and Areas of Concern Related to Site:

Area groundwater is used by the city of Liberty for its municipal water supply. The TCE and other VOCS have migrated into the on-site soils and on-site and off-site groundwater. Interim response actions and remedial actions completed by the city of Liberty under Agency oversight have reduced TCE levels in the groundwater and the municipal water supply. Currently, no city of Liberty municipal wells have detectable levels of TCE or other VOCs.

Remedial Actions at Site:

In 1976, the U.S. Environmental Protection Agency (EPA) notified the city of Liberty that the chemicals stored on-site had to be removed and properly disposed. About 300 drums of waste were removed from the site in July 1977. In 1979, TCE was detected in the city of Liberty's raw water supply and in 1982 the Department of Natural Resources (the department) determined the Lee Chemical site was responsible. Additional clean-up activities occurred on-site and the site was proposed for the *Registry* in August 1983. The site was placed on the *Registry* in January 1984. On October 15, 1984 the site was proposed for the National Priorities List (NPL). The site was placed on the NPL on May 20, 1986.

Upon the department's recommendation, the city of Liberty implemented Interim Response Actions from January 1984, until the implementation of the Remedial Actions beginning in 1993. The city of Liberty pumped the on-site Existing Well No. 3 (EW-3) and the municipal Production Well No. 2 (PW#2), (which was the most contaminated city municipal supply well) to Town Branch. The discharge was permitted under a Missouri State Operating Permit (MSOP). The interim response actions created a steady reduction in TCE contaminant levels in all the municipal wells over time until the only TCE detected was in the two most contaminated wells, EW-3 and PW#2. Currently, none of the city of Liberty municipal supply wells have detectable levels of TCE or other VOCs including all new municipal wells.

In late 1986, the city of Liberty's contractor performed a geophysical study of the subsurface area in the vicinity of the site and municipal well field. The study indicated the subsurface was more complex than originally thought and additional site characterization was needed to better define the hydrogeologic setting. The study also concluded that the TCE contamination was manageable, and that expansion of the current well field to meet future demand was feasible.

In August 1988, the department and the city of Liberty entered into a Consent Agreement for the city of Liberty to conduct a RI/FS. The RI field work was conducted from early 1989 to mid-1990. The RI determined that 1) TCE contamination was present in the soil at depths ranging from 1 to 20 feet below ground level, with the highest concentration, 11,000 ppb, at a depth of 20 feet, east of the old water plant building foundation; 2) a plume of

TCE contamination was suspended in and moving with groundwater in the aquifer underlying the site; 3) TCE contamination was present in the out-of-production municipal supply well (WSW2 or PW#2) and abandoned on-site well (EW-3); and 4) contamination was not present in the remaining municipal wells due to the continued implementation of the interim response action. The city of Liberty completed the RI/FS in August 1990.

An Administrative Record was developed under an EPA contract. The RI/FS and Proposed Plan for the site were released to the public for review and comment on December 24, 1990. In addition, a public hearing was held on January 9, 1991, where the department and EPA officials answered questions about problems at the site and the remedial alternatives under consideration. All comments received during the 30-day comment period were included in the Responsiveness Summary, which is part of the Record of Decision (ROD). The ROD was signed by the EPA on March 21, 1991.

The selected remedy was an enhancement of the previous ongoing interim response action. The remedy included 1) the continued extraction of contaminated groundwater from the newly constructed on-site EX-1 well and off-site PW#2 well to remove contaminants from the aguifer of concern and to control groundwater movement away from the site; 2) the installation of an on-site in situ aqueous soil washing system consisting of infiltration trenches to enhance the flushing of contaminants from the on-site soils; 3) the discharge of the extracted groundwater to Town Branch Creek under the terms of a state operating permit (MSOP); and 4) the continued monitoring and reporting of the soil washing and groundwater and surface water sampling locations via monthly and quarterly progress reports. A contingency phase of the RA consisting of air stripping or other treatment methods of the extracted groundwater prior to discharge was included in the selected remedy in the event that additional treatment of the extracted groundwater prior to discharge was necessary to meet either health based risk levels, the existing MSOP permit limits, or other ARARs.

In March 1992, the department and the city of

Liberty entered into an AOC for the Remedial Design/Remedial Action (RD/RA) with a Statement of Work. Plans and specifications for implementing the RD/RA were approved in December 1992, and RA construction began in January 1993. The city of Liberty began operating the RA system in January 1994, and the Agencies determined the RA system was operational and functional on March 26, 1994. On April 26, 1994, the final inspection of the RA system was conducted, and the system was found fully functional.

The RA system, which includes the on-site in situ soil washing and groundwater extraction and discharge to a permitted location, continues to operate as it has in past years. Aside from periodic repair and maintenance, the RA system continues to operate as designed. The city continues to conduct monthly and quarterly monitoring of the RA system, and submits monthly and quarterly reports to the department and the EPA.

The department completed and the EPA concurred on the first Five-Year Review (FYR) Report in May 1999, the second Five-Year Review Report in September 2004, the third Five-Year Review Report in July 2009, and the fourth Five-Year Review Report in July 2014. Based on the information and data obtained found in the four reviews, the department determined the ongoing remedial actions at the site continues to operate as designed and be protective of human health, welfare and the environment. The RP is currently conducting a number of follow-up activities that will be evaluated to determine what additional actions may be taken to achieve the site's clean-up in a more expedited timeframe and to address the two issues from the fourth FYR Report.

General Geologic and Hydrologic Setting:

The site is located on the alluvial plain of the Missouri River near the northern valley wall. The present course of the river is nearer the south valley wall about 2 miles south of the site. An abandoned meander loop is present within 0.25 miles south of the site.

The site is underlain by about 60 to 90 feet of alluvium. In general, the upper 15 to 35 feet of alluvium is predominately fine-grained

material, such as clay and silt. The deeper alluvium is made up mostly of coarse-grained sands and gravels.

Under normal conditions, the water table is within 10 to 20 feet of the surface, and the flow direction is to the east-southeast. The city of Liberty well field creates artificially low water levels in the local area, modifying the natural groundwater flow conditions. All of the city's municipal wells are hydraulically downgradient of the site; therefore, the downgradient flow velocity is increased by the influence of the municipal wells.

Bedrock structure, type and erosional configuration may influence the transportation of contaminants that have migrated downward to the base of the alluvium. Geophysical and borehole data indicates that the bedrock surface, while quite uneven, slopes generally to the south and east. The uppermost bedrock unit below the site is predominantly shale; however, it may also include thin sandstones and/or limestones.

The migration of dense, non-aqueous phase liquids that may accumulate at the alluvium/ bedrock interface can be difficult to predict in this setting.

Public Drinking Water Advisory:

The seven full time operating municipal wells with the two backup emergency wells for the city of Liberty are located approximately 2,000 feet east of the site. The wells are 89 to 102 feet in depth, and are situated in an unconsolidated, alluvial formation. The water system serves more than 30,000 people.

Levels of TCE have dropped significantly from the concentrations recorded in 1982. This is probably due to the city's interim response and remedial actions to date, which include pumping two wells in the alluvial aquifer to a stream in order to purge the TCE from the aquifer and to contain the contaminated plume. Further well field management techniques and treatment modification by the city of Liberty have reduced TCE levels in the drinking water to below detection limits. The city of Liberty municipal wells are now monitored annually and shows only trace amounts of cis-1,2-dichloroethene.

Health Assessment:

Lee Chemical is the former location of a chemical repackaging plant, once housed in a building that served as a water treatment plant for the City of liberty in southern Clay County, Missouri. The building on the site, which is located on the Missouri River alluvium, was removed. The small building now located on the fenced vegetated site houses an extraction well. The City of Liberty's well field is located one quarter—mile from the site.

Ingestion of contaminated groundwater from the municipal well field was the main route of exposure. The following are the major contaminants of concern found at the site: carbon tetrachloride, 1,1-dichloroethane, methylene chloride, 1,1,1-trichlroroethane, and TCE. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

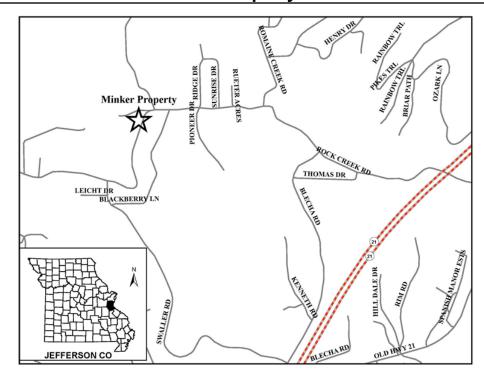
Remedial actions at the site have significantly reduced contaminant levels in the groundwater, and are continuing.

Investigation by the Missouri Department of Health and Senior Services determined that the property approximately 50 feet down gradient from the site is now on public water. Interviews with area residents failed to uncover any patterns of adverse health effects consistent with exposure to chemicals known to be present at the site. However, in the past, significant exposure occurred to individuals using the public water supply. In addition, a new municipal well field was developed about two miles southwest of the site.

Although the remedial action has been very effective, a health risk still exists at this site. Levels of TCE in the groundwater are still

above the public drinking water standard. Remedial action should continue to reduce the level of TCE in the groundwater and to prevent spreading of contaminants into the other water supply wells.

As part of the Third Five-Year Review for the site and at the request of the department, DHSS reviewed site information and provided risk assessment for the site. Two contaminants, vinyl chloride and acetonitrile which had not previously been reported during the previous two five-year reviews were incorporated in the risk assessment. Although the remedy is functioning as intended and many wells show non-detects or substantial reductions in the levels of contaminants of concern over the period under review, vinyl chloride, a product of the biological reduction of TCE was found to exceed EPA's drinking water maximum contaminant level (MCL) in two site wells. Acetonitrile, reported in site wells since 2006 has only modest toxicity. However, it can be metabolized to produce hydrogen cyanide which is the source of its observed toxic effects. Along with TCE. acetonitrile contributed substantially to the non -carcinogenic risk at the site. Reports of relatively high detection levels of vinyl chloride, acetonitrile as well TCE would seem to suggest the need for further/continued monitoring of site contaminants.



Site Name: Minker Property

Classification: Class 4

Date of Registry Placement: June 14, 1984

Date of NPL Listing: September 8, 1983

<u>Site Address</u>: West Rock Creek Road, Hillsboro, Jefferson County, Missouri, Maxville Quadrangle

Present Property Owner: Carl and Betty

Fisk

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

In 1971, dioxin-contaminated still bottoms, presumably mixed with oil, were used as a dust suppressant in a horse arena. In 1972, dioxin-tainted soil from the horse arena was excavated and used as fill material in residential areas, including the Minker, Stout and Cashel residences. About 120 cubic yards of contaminated soil were placed in a

ravine immediately next to the Minker house. Eventually, fill material eroded out of the ravine into Romaine Creek. A removal action was implemented to remove the dioxincontaminated soil from each of the affected properties. One of these properties, the former Minker Property, remains listed on the Registry due to dioxin contamination remaining at depth. The other properties that made up the site were cleaned to health-based screening levels and were removed from the Registry in 1990.

On September 24, 2003 the Minker property was sold to a private citizen. No redevelopment of the property or change in use has occurred.

Environmental Problems and Areas of Concern Related to Site:

The site should pose no environmental problems, since the dioxin contamination remains at depth and is covered by 4 feet of clean soil. The site will continue to be monitored and maintained to prevent potential erosion. The fence surrounding the site was repaired and a house has been boarded to control access to the site.

Remedial Actions at Site:

In 1988, the U.S. Environmental Protection Agency (EPA) completed the entire Minker/ Stout cleanup. Dioxin-contaminated material from each of the separate properties that make up the entire Minker/Stout Site were excavated and placed on site in five storage buildings.

This specific sub-property, referred to as the Minker Property, was excavated to a 4-foot depth before bedrock was encountered and excavation halted. Post-excavation sampling of this area showed levels of dioxin as high as 266 ppb remained. The excavated area was filled in and capped with clean top soil. Permanent survey markers were then installed to delineate this area where contamination was left at depth. Erosion control walls were also constructed in the area where the contamination remains.

The Minker/Stout Site is one of 27 eastern Missouri dioxin sites subject to a Consent Order entered in Federal Court on December 31, 1990. In accordance with the Consent Decree, a thermal treatment unit was constructed at Times Beach and used to treat the dioxin-contaminated materials from this site. This included 26,420 tons of bagged materials, which were delivered to the Times Beach Thermal Treatment Facility between December 1996 and February 1997. Storage buildings were removed, and site restoration is complete.

General Geologic and Hydrologic Setting:

The site is located in an upland area, with steep slopes adjacent to streams. Surface drainage from the site enters Romaine Creek, which loses water to the subsurface.

The surficial materials beneath the site consist of several feet of wind-deposited, silty clay, or loess, over stony clay that was derived from the weathering of bedrock. The bedrock is deeply-weathered limestone.

Water-tracing studies indicate that water lost to the subsurface in the upper reaches of Romaine Creek reemerges at two springs in the lower portion of the watershed. The water first reemerges at Mastis Spring, located about 1 mile north of the site. A portion of the water discharged from Mastis Spring is, in turn, lost to the subsurface, emerging at Bubbling Spring, about 1 mile farther downstream.

Public Drinking Water Advisory:

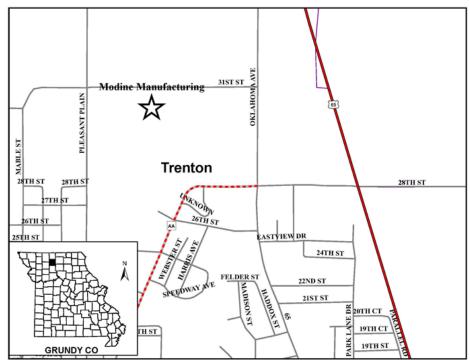
Most area residents are served by Jefferson County Public Water Supply District No. 3, which purchases water from St. Louis County Water Company. The site is located near Romaine Creek, a tributary of the Meramec River, which serves as the source of water for St. Louis County Water Company. A water company intake is 7 to 8 miles downstream from the site. The nearest public well serves Valley Acres Mobile Home Park. This well is located about 1.5 miles southeast of the site. In addition, some private wells may be located in the area. The site poses little threat to public water systems, but could potentially affect nearby wells.

Health Assessment:

Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's lymphoma, Hodgkin's disease, and porphyria cutanea tarda.

Due to the residual dioxin contamination at depth, the Missouri Department of Health and Senior Services (DHSS) recommends that this site continue to be monitored to prevent potential erosion and disturbance, and therefore exposure to dioxin. In a recent inspection report, the Missouri Department of Natural Resources (the department) noted that the property is not completely fenced; therefore, trespassers and vagrants can gain access to the property. The gate has remained locked to prevent vehicles entering the area; however the entire front fence has been taken down. Additional fill brought in and piled up near the entrance gate will be used to bring up the property grade to reduce the slope near the road.

According to DNR's 2007 site inspection report, houses on site previously reported as having deteriorated as to be a health hazard have been torn down and hauled away except for one house at the west end of the property which the owner feels is in good condition. Development of recently sold property surrounding the site may increase trespasser frequency.



Site Name: Modine Manufacturing

Classification: Class 4

Date of Registry Placement: January 8,

1996

<u>Site Address:</u> 822 Industrial Drive, Trenton, Grundy County, Missouri, SW 1/4, Sec. 9,

T. 61N, R. 24W

Present Property Owner: Modine

Manufacturing

Lead Agency: DNR

Waste Type: Heavy metals and chromium

Quantity: Not determined (See Site

Description)

Site Description:

Modine Manufacturing Company has manufactured truck and car radiators at the present location since 1968. Disposal practices in the late 1970s led to the contamination of soil in one portion of the facility. This area, a former sludge pit, is contaminated with a variety of metals. About 36,000 gallons of sludge may have been

disposed in this pit over a three year period. Modine disposed of metal hydroxide sludge through the Trenton sanitary system from 1968 until 1971. In 1971, an unlined pit was constructed to contain the metal hydroxide waste. The pit, about 75 by 16 feet and was 10 feet deep, was used from 1971 until 1976. In 1976, Modine built an addition to the manufacturing facility, which included a wastewater treatment facility.

When Modine ceased using the pit for metal hydroxide waste, the pit was allowed to dry. Soils and construction debris then were used as fill material over the dried waste.

Environmental Problems and Areas of Concern Related to Site:

Surface water and groundwater are potentially at risk of contamination if metals migrate from the capped pit. Soil erosion occurred near the driveway due to resurfacing of the drive. This area is outside of the surveyed area.

Remedial Actions at Site:

On June 22, 1994, the U.S. Environmental Protection Agency (EPA) completed a Site Inspection that included collection of soil samples from the former sludge pit. Three of

the six samples exceeded the maximum regulatory limit for the Toxicity Characteristic Leaching Procedure (TCLP) for chromium. Chromium was detected to about 5 feet below the surface. Modine capped the area with clay and topsoil in October 1998. The area was seeded, and vegetative cover is now well established and well maintained.

General Geologic and Hydrologic Settings:

This site is located on the Dissected Till Plains of northern Missouri. The area is blanketed by a layer of low-permeability till, consisting of a poorly-sorted mixture of clay to boulder-sized particles. The till is covered by a thin mantle of loess, or wind-deposited silt.

Bedrock composed of shale, limestone, clay and sandstone is present at a depth of 50 to 100 feet below the surface.

Gravel layers within the till provide the primary source of groundwater for this area. Yields from wells in the till are generally low, though very high yields may be obtained from preglacial stream deposits. These types of stream deposits are known to exist east of the city of Trenton at a distance of more than 2 miles from the site.

Water from the consolidated bedrock is highly mineralized. The mineral content increases with depth. Wells drilled to a moderate depth into bedrock may yield a limited amount of water that is of marginal quality.

Public Drinking Water Advisory:

No public water supplies are expected to be affected by this site. The nearest sources of

public drinking water are the surface water intakes for the city of Trenton. The site is not within those watersheds, and the nearest public wells are 18 miles away.

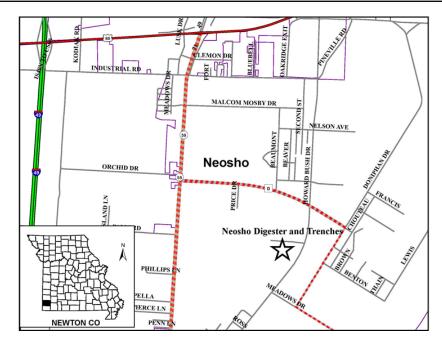
Health Assessment:

The metals that pose a potential risk to human health include cadmium, chromium, copper, lead and zinc. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

The metals present at the site are mobile and may migrate off-site in ground water or surface water. Consequently, both surface water and groundwater are at risk. An investigation by the Missouri Department of Health and Senior Services in May 1998 found no private wells nears the site.

Based on available information, the site is well maintained, but a health threat exists. Off-site migration of wastes has occurred. Surface water run-off has been identified as the only potential exposure media.

Neosho Digester and Trenches



Site Name: Neosho Digester and Trenches

Classification: Class 4

<u>Date of Registry Placement</u>: January 9, 1984

<u>Site Address:</u> Neosho, Newton County, Missouri, part of NE 1/4, NE 1/4, Sec. 16, T. 24N, R. 32W, Neosho West Quadrangle

Present Property Owner: City of Neosho

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin) and

2,4,5-trichlorophenol

Quantity: Not determined

Site Description:

The site is an abandoned concrete sewage digester used in the past by the Fort Crowder Military installation. In 1971, 225,000 gallons of dioxin-contaminated rinsewater and wastewater from the Northeastern Pharmaceutical and Chemical Company (NEPACCO) in Verona was deposited into the digester for use in treatability studies conducted by the wastewater school. In 1978, scrap material was dumped into the digester,

causing it to overflow on the north and east sides. A trench was excavated next to the digester, and the spilled material was buried in the trench. In 1981, sampling of the digester documented dioxin at concentrations up to 60 parts per billion (ppb) and 2,4,5-trichlorophenol (TCP) at concentrations up to 250,000,000 ppb in the center and at the bottom of the digester at a 20.5 to 24 foot depth. The city of Neosho capped the digester to prevent water infiltration and exposure. A chain link fence restricts access, and areas of poor vegetation have had new growth established. The city routinely mows the site.

This site is located about 3 miles south of Neosho, Missouri, in a relatively rural area. About 70 farmhouses are located within a seven mile radius of the site.

Environmental Problems and Areas of Concern Related to Site:

The possibility for contamination of groundwater exists due to permeability of the soils. Surface water contamination from erosion is also a possibility.

Remedial Actions at Site:

The city of Neosho capped the trench area.

Subsurface investigations were conducted to determine engineering properties of subsurface soils. In June 1988, the U.S. Environmental Protection Agency (EPA) drilled at an angle underneath the digester to check for dioxin contamination in the soil below the digester. No dioxin was detected in the samples collected, demonstrating that no leaks or cracks are present at the base of the digester. About 0.5 ppb of dioxin was found in the trench to the east of the digester. The city of Neosho has a consent order from the EPA to maintain the clay cap. No cleanup or groundwater monitoring is planned at this time.

General Geologic and Hydrologic Setting:

The site is located in an upland setting with surface drainage to the west. The topography and geology are typical of the Springfield Plateau.

Soils range from silty clay to silty and clayey gravel. Bedrock is Mississippian-age, cherty limestone. Permeability in this limestone is high along solution-enlarged openings. Springs and losing stream segments are located in the upland drainages. However, sinkholes have not been observed in the vicinity of the site, and no record exists of catastrophic sinkhole collapse in the immediate area.

Water lost to the subsurface recharges the shallow aquifer, which consists of cherty limestone. This aquifer is used as a water supply for individual homes in rural areas. It is separated from the deeper aquifer by a confining layer, the Chattanooga Shale. The deeper aquifer is the source of some public water supplies in the area, and it is also tapped by some of the deeper private wells.

Rainfall in the area near the digester percolates through the underlying gravelly soil and migrates through fracture openings into bedrock. Some of the water is later discharged at nearby springs, and some might be pumped from wells that are open to the

shallow aquifer. Any water-soluble or liquid contaminants present outside the digester would follow the same pathway. The deeper aquifer has not likely been affected; however, connections between the upper and lower aquifer may exist due to the presence of wells that are open to both aquifers.

Public Drinking Water Advisory:

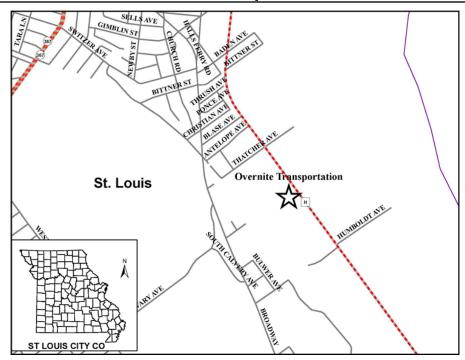
Several wells are serving small businesses 1 mile west of the site along Highway 71. Little is known about some of these wells. Some are known to be 400 to 600 feet deep, with as little as 60 feet of casing. Private wells may also be located in the area. The threat to these local wells is unknown, but no threat is posed to the city of Neosho's water supply.

Health Assessment:

Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's lymphoma, Hodgkin's disease, and porphyria cutanea tarda. Acute poisoning with 2,4,5-trichlorophenol causes decreased activity, motor weakness, and possibly convulsive seizures.

Dioxin is not leaking from the digester. Based on available information, a threat to the public health does not exist at this time as long as the site is mowed, fenced, and visually inspected for erosion and deterioration of the cap.

Overnite Transportation



<u>Site Name</u>: Overnite Transportation

Classification: Class 4

Date of Registry Placement: January 22,

1992

<u>Site Address:</u> 7455 Hall Street, St. Louis, Missouri, T. 3N, R. 7E, Granite City, Illinois-Missouri Quadrangle

Present Property Owner: UPS Freight Inc.

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

The site is located in an industrial area of the city of St. Louis. The property was owned formerly by Pacific International Express in the late 1960's and early 1970's. During that time, the gravel lot was sprayed on several occasions with waste oil for dust suppression. Some of this oil was contaminated with dioxin. In the early 1980's, levels of dioxin above 1 part per billion (ppb) were detected in the sprayed areas. After Overnite Transportation

Company acquired the property in 1981, the contaminated lot was capped with a 6-inch asphalt cover. The site covers about 435,382 square feet, of which 66,000 square feet are covered by buildings or other obstructions. According to the U.S. Environmental Protection Agency (EPA), the original traffic ways were concrete pads. Asphalt was filled in around the concrete pads prior to applying the cap. The cap is in good condition. The property is fenced, and a guard is present when the terminal is not open. Generally, the vard operates 24 hours a day.

Environmental Problems and Areas of Concern Related to Site:

Long-term deterioration of the asphalt cap could be cause for concern if it is not maintained.

Remedial Actions at Site:

In October 1983, the department ordered Overnite to complete EPA-approved remedial actions at its facility. These actions consisted of applying a layer of asphalt directly over existing pavement and applying crushed rock over unpaved areas. In 1990, the EPA completed additional sampling, collecting a total of 843 samples across the site. Of these

843 samples, 675 had no detectable levels of dioxin; however, dioxin concentrations above 1 ppb were found in 31 samples.

This site is one of 27 eastern Missouri dioxin sites subject to a Consent Decree entered in Federal District Court on December 31, 1990. In accordance with the Consent Decree, a thermal treatment unit was constructed at Times Beach and used to treat the dioxin contaminated materials from this site.

EPA completed an Engineering Evaluation/ Cost Analysis (EE/CA) on July 21, 1995. The purpose of the EE/CA was to select the remedy and cleanup criteria for the 27 eastern Missouri dioxin sites. The cleanup criterion set for industrial and commercial sites such as Overnite Transportation was 20 ppb.

The dioxin levels were below the 20 ppb level at which excavation would be required. The property owners will be required to maintain the cap in perpetuity.

General Geologic and Hydrologic Settings:

The Overnite Transportation Company facility is located 0.5 miles west of the Mississippi River on the western edge of the flood plain. The site is protected from the river by an Army Corps of Engineers flood wall. The topography is flat and the landscape is dominated by industrial development. The entire lot surrounding the terminal building is paved with asphalt and concrete.

Surficial materials along Hall Street are a mixture of fill, alluvium and alluvial-type soils. The fill is composed mainly of construction debris dumped in low-lying areas during the 1930's. Detailed locations of fill are unknown. The Mississippi River valley alluvium in the vicinity of the site is expected to be 45 feet thick or less. Materials directly beneath the site are reportedly natural, and consist mostly of silt with some sand. Coarser sands are expected to predominate at depth. Permeability values across the flood plain can change significantly from layer to layer, especially in the near-surface units. Detailed investigation is needed to evaluate subsurface conditions at the site, but soil permeabilities are expected to be moderate to high.

Bedrock beneath the site is Mississippian-age Ste. Genevieve Limestone, which is a massively-bedded, sandy, clastic limestone, with some layers of chert and some sandstone lenses occurring locally. The Ste. Genevieve Limestone, and a sequence of similar Mississippian-age carbonates beneath it, are not favorable for the development of drinking water wells. High concentrations of naturally-occurring, dissolved solids in the area render the bedrock aquifers useless for most purposes.

The water table is less than 20 feet from the ground surface at normal river levels. Dioxin contamination is not expected to move readily down into the groundwater. If dioxincontaminated particles should reach the groundwater, they may migrate eventually through the alluvium into the Mississippi River. However, contaminants in the shallow groundwater system would probably take several years to enter the river.

Public Drinking Water Advisory:

Drinking water to area residents is provided by the city of St. Louis, which obtains water through intakes on the Mississippi and Missouri Rivers. The water intake on the Mississippi River is located upstream of the Overnite Transportation Site. Groundwater in the area is of poor quality and is not known to be used for drinking purposes. The risk to drinking water systems in the area is, therefore, minimal.

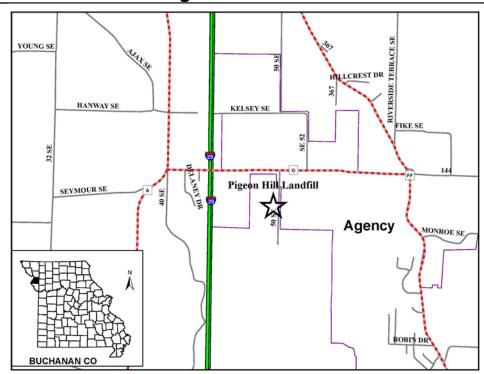
Health Assessment:

Dioxin is one of the most toxic substances known; however, its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's lymphoma, Hodgkin's disease, and porphyria cutanea tarda.

Because the dioxin at the site is underneath an asphalt cap and the site has a locked gate and is fenced, there is currently no exposure. Potential exposure routes to the dioxin at this site may include ingestion of the contaminated soil, inhalation of contaminated dust particles, and dermal contact with the contaminated soil or dust. Contamination of surface water and groundwater is unlikely because of the asphalt cap over the soil.

If the use of this site were to change or the surface excavated or graded, and contaminated soil became exposed, exposure to dioxin-contaminated soil could occur. There is no risk at this site as long as the asphalt cap is maintained.

Pigeon Hill Landfill



Site Name: Pigeon Hill Landfill

Classification: Class 4

Date of Registry Placement: June 14, 1984

<u>Site Address:</u> Ten miles south of St. Joseph, bordering the Northeast corner of the Pigeon Hill Wildlife Area, SE 1/4 of the SW 1/4 of Sec. 12, T. 56N, R. 35W, St. Joseph, Buchanan County, South Quadrangle

<u>Present Property Owner</u>: Frank Norris, Buchanan County (Trustee)

Lead Agency: DNR

<u>Waste Type</u>: Aluminum, barium, iron, manganese, cadmium, chromium, copper, nickel, zinc, calcium, magnesium, and sodium, pesticides, volatile organic compounds, and semi-volatile organic compounds

Quantity: About 100 tons of industrial wastes are in the landfill.

Site Description:

The site consists of a 36-acre, closed municipal sanitary landfill. Partially wooded

ridges and valleys are present to the north and south. The site is directly north and adjacent to the Pigeon Hill Wildlife Area. Contaminants include heavy metals, pesticides, solvents and various inorganic wastes. In all, more than 100 tons of industrial wastes were deposited at the site. Buchanan County took ownership of the property when the previous owner, Frank Norris, failed to pay taxes.

Environmental Problems and Areas of Concern Related to Site:

Potential for surface and groundwater contamination exists. The site is located next to the state-owned Pigeon Hill Wildlife Area. Leachate from the closed portion of the landfill previously has discharged into a stream in the Pigeon Hill Wildlife Area. Surface water near the leachate seep has contained a variety of heavy metals, as well as acetone, xylene, parathion, chlordane, heptachlor, carbon disulfide, 2,4-D, 2,4,5-T, hexachlorobenzene, cyclohexane, pyrene, fluoranthene, nickel, bis (2-ethylhexyl) phthalate, 2,4-dichlorophenol, and numerous unknown chemicals from steel treating and pesticide manufacturing.

Remedial Actions at Site:

The Missouri Department of Natural Resources (the department) issued a Notice of Violation to the owners in August 1990, due to the amount of leachate leaving the site. During 1991, the case was referred to the Attorney General's Office. The city of St. Joseph initiated efforts to correct the on-site leachate problems. The department's Solid Waste Management Program (SWMP) and Kansas City Regional Office were involved with actions to correct problems. A pond to collect runoff was constructed in August 1995 near the east fence line. Since then, about one million gallons of water have been pumped from the collection pond and taken to St. Joseph's wastewater treatment plant. Fencing around the site is complete, including along the wildlife area border. The SWMP and the city of St. Joseph developed a site closure plan.

In 1998, the SWMP determined that the closure plan was not being implemented properly. The city of St. Joseph committed to implementing the landfill closure plan and applied landfill cover, filled a gully, built access roads, constructed a berm, and repaired a leachate collection pond.

During 1999, the final soil cover was applied to the landfill. Grading, shaping and smoothing were completed, and a vegetative cover was established. Leachate is being collected, pumped and hauled to the city of St. Joseph for treatment. Leachate no longer leaves the site and flows into the Pigeon Hill Wildlife Area. A stormwater detention basin was constructed during 2000 in the southern area to contain erosion prior to discharge to the Pigeon Hill Wildlife Area.

The SWMP determined that all closure and enforcement requirements for the Pigeon Hill Landfill were met and closed its enforcement case against the landfill. The city of St. Joseph must continue to follow its management plan to repair the landfill cover when needed and prevent leachate from leaving the landfill property.

General Geologic and Hydrologic Setting:

In general, the soils at this site initially

consisted of about 20 feet of loess underlain by variable thicknesses of glacial till. However, site disturbance resulted in the alteration of natural conditions. Unconsolidated material present directly beneath the landfill is expected to consist of about 0 to 10 feet of silty clay, underlain by sandy clay at depths of 10 to 15 feet below the surface. The sandy clay reportedly contains interbedded sands, ranging from one to six feet in thickness, present at depths of 25 to 70 feet. These interbedded sand lenses do contain appreciable amounts of shallow groundwater and could be affected by site contamination.

The uppermost bedrock beneath the site is the Amazonia Limestone. Because the till and underlying bedrock typically display very low permeability, there is little likelihood that contaminants will migrate into deep groundwater supplies. Furthermore, deep groundwater supplies in this area normally are marginal in quantity and quality.

Shallow, large-diameter dug wells possibly did exist or are present on or near the facility. If abandoned wells were not plugged properly, groundwater supplies could be affected by contaminant migration down boreholes.

Public Drinking Water Advisory:

No public wells or intakes exist in the immediate area. Some of the local area is served by the Missouri American Water Company of St. Joseph, which receives water from wells in the Missouri River alluvium on the north side of St. Joseph. These wells are not affected by the site. Private wells used by nearby residents are potentially threatened by contamination from the site.

Health Assessment:

The Pigeon Hill Landfill is a 36-acre, closed landfill located ten miles south of St. Joseph, in Buchanan County, Missouri. The site is directly north and adjacent to the Pigeon Hill Wildlife area, and less then one hundred yards from the City of St. Joseph Sanitary Landfill.

Over one hundred tons of wastes contaminated with heavy metals, pesticides, solvents, and various inorganic wastes, were

deposited at the site. Leachate from the landfill has polluted surface water to the south and east of the site. Surface water below the leachate seeps has contained a variety of metals; acetone, xylene, parathion, chlordane, heptachlor, carbon disulfide, 2,4-D, 2,4,5-T, hexachlorobenzene, cyclohexane, pyrene, silvex, fluoranthene, bis (2-ethylhexyl) phthalate, 2,4-dichlorophenol, and numerous unknown chemicals from steel treating and pesticide manufacturing. The U.S. **Environmental Protection Agency also** collected soil samples and identified a variety of hazardous wastes. There are other chemicals known to be present at the site, for which no concentrations were given.

The following are the major contaminants of concern found at the site: arsenic, barium, bis(2-ethylhexl)phthalate, cadmium, chromium, fluoranthene, manganese, nickel, pyrene, 2,4-dichlorophenol, and zinc. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

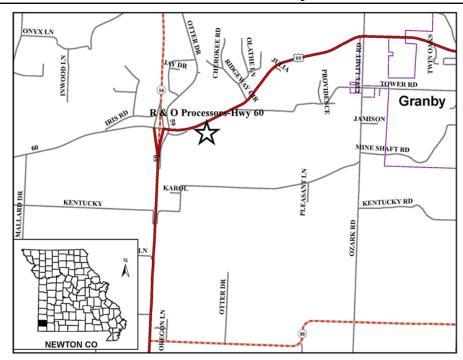
Leachate samples collected by the Missouri Department of Health and Senior Services in 1995 confirmed that a variety of contaminants were still leaching from the site. Samples collected in 1997 revealed that 2,4-D; 2,4,5-T, and several metals were leaching from the site. Portions of the site have been recontoured on at two occasions. This resulted in a temporary reduction in erosion and leachate. Leaching was observed during a visit in November 1997. Herbicides were not detected in leachate during routine sampling performed in 1999.

Ingestion, inhalation, and dermal contact by a variety of pathways are the possible routes of human exposure at this site. Numerous chemicals including some carcinogens have contaminated surface water. The aquifer beneath the site is at risk and may be contaminated. Inhalation and direct contact are possible because some waste is exposed due to erosion of the cap.

Exposure from direct contact is possible at the site because of its location next to the Pigeon Hill State Wildlife Area. The wildlife area is used for hunting, fishing, hiking, mushroom hunting, target practice and organized events. Sections of the wildlife area currently are being restructured. Tree removal and grading is occurring directly next to the landfill. Installation of a new fence along the southern site boundary should help to reduce the number of wildlife area users who come into contact with the site. A public water system now exists in the area and is used by residents near the site.

Based on available information, the toxic and carcinogenic nature of some of the materials present, the known off-site contamination, and the potential groundwater contamination, a health threat exists at this site.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: R & O Processors—Hwy 60

Classification: Class 4

<u>Date of Registry Placement</u>: October 10, 1991

<u>Site Address:</u> About three miles west of Granby on Highway 60 in Newton County, Missouri, NE 1/4, NW 1/4, Sec. 10, T. 25N, R. 31W, Granby Quadrangle

Present Property Owners: Robert W. Moffet

Lead Agency: DNR

Waste Type: Heavy metals and cyanide

Quantity: Not determined

Site Description:

The site is located in a rural, light industrial area. The site is an abandoned metal finishing facility that conducted business from 1981 to 1990. During this period of operation, the company performed various metal finishing processes, including zinc, brass, copper, chromium and nickel plating. In 1990, the owners of the facility and property filed both business and personal bankruptcy and

abandoned the facility. The Missouri Department of Natural Resources (the department) documented about 30,000 gallons of plating waste and sludge, characterized as hazardous waste, abandoned in concrete tanks, vats and drums at the site. Building structures, equipment and surface soils were also contaminated.

About 50 residences are located within one mile of the site, and 25 residences are within one-half mile.

Environmental Problems and Areas of Concern Related to Site:

Potential shallow groundwater contamination is of concern; however, the sources of contamination have been removed. The closest residence is adjacent to the site and within 50 yards of the process building. This residence and most of the surrounding residences obtain water from private wells.

The site is near Shoal Creek which the state has designated as a Whole-body Contact Recreational stream.

On April 21, 2003, the department conducted soil sampling to determine the cause of stressed vegetation in an approximately 40

foot by 50-foot area on the east side of the former processing building. A priority pollutant analysis conducted on the samples, showed low concentrations of metals, pentachlorophenol (PCP), and toluene.

Remedial Actions at Site:

In December 1990, the department requested that the U.S. Environmental Protection Agency (EPA) inspect the site for a potential removal cleanup under the federal Superfund program. The EPA conducted a removal assessment in 1991, and determined that the surrounding population, surface waters, and groundwater were threatened by several hundred drums, tanks and vats of plating process waste, containing dangerous levels of heavy metals and cyanide. Included in these wastes were spent acidic stripping and rinse solutions, and caustic, sludge byproduct wastes.

In November 1991, EPA contractors began the removal operation. Twenty waste streams, totaling 600 drums, were segregated and staged for disposal. A total of 1,220 tons of contaminated soil waste was excavated and landfilled off site. The site was restored by the application of 750 cubic yards of topsoil, followed by seed and straw. Fifty tons of scrap metal were decontaminated on site and shipped to a local scrap dealer. Contaminated scrap wood (mostly pallets) was shredded on site and blended with contaminated soil for disposal. The on-site operations building was sandblasted and pressure washed. Twenty thousand gallons of generated wastewater were disposed off site. These removal activities were completed in March 1992, and the final drums of waste were transported from the site in April 1992.

General Geologic and Hydrologic Settings:

The site is located on a ridgetop, where the topography is nearly flat to gently sloping. Surface runoff flows to Dry Branch or another unnamed tributary of Shoal Creek. Shoal Creek, which is a gaining stream, is located about 1.5 miles northwest of the site. Many of the tributaries to Shoal Creek lose flow to the subsurface.

Surficial materials are expected to be 30 to 40

feet thick and consist mainly of cherty, red clay residuum. The residuum is a weathered product of the underlying cherty limestone bedrock and exhibits typically a moderate to high permeability. The chert content of the residuum varies, but it is often present as a relict structure, retaining its stratigraphic position.

Bedrock beneath the site is Mississippian-age Burlington-Keokuk Limestone, a medium- to coarse-grained limestone with chert beds and nodules. Weathering of the bedrock has resulted in solution-enlarged fractures, bedding planes, caves, sinkholes and springs. Such karst features have been observed in the area, but are not known to exist beneath the site.

The uppermost aguifer comprises the Burlington-Keokuk Limestone and the underlying Elsey and Reeds Spring Formations. All of these units are cherty limestones. Together, these units have a thickness of about 265 feet beneath the site. Shallow groundwater flow is expected to be to the northwest toward Shoal Creek. Most private water supply wells use the uppermost aguifer. The upper aguifer is separated from the lower aguifer by a confining unit composed of the Mississippian Northview Formation and Compton Limestone and the Devonian Chattanooga Shale. The lower aguifer includes Cambrian and Ordovician formations composed of sandstones and cherty dolomites. Water wells that require higher yields, such as community wells, must tap the deeper aquifer, which is hundreds of feet thick.

Public Drinking Water Advisory:

The city of Granby is served by three deep wells, which are located 2.5 to 3 miles east and are not affected by the site. Two wells, which formerly served Vern's Chuckwagon Restaurant at the junction of Highway 71 and Highway 60, are 0.3 miles west of the site. It is unknown if these wells are affected by the site. Four wells serving the Evergreen Park Subdivision are located 0.3 to 0.6 miles northeast. The department's Public Drinking Water Program issued a notice of violation to the subdivision for exceeding the EPA's drinking water standard, the maximum

contaminant level (MCL), for cadmium. The subdivision has also exceeded the action level for lead in the drinking water. This exceedance is most likely due to historic lead and zinc mining activities in the area, since data from other mining sites in Missouri have concluded that metals can migrate one-fourth to one-half mile from a mine void. The department concluded that the exceedances are not attributable to the R&O Processors Site. Karst topography exists in the area, and the well located on the R&O Processors property is contaminated. The risk to public water systems is unknown. However, the site does pose a threat to shallow groundwater and to nearby private wells.

Surface water drainage from the site flows to Shoal Creek, which is the source of drinking water for the city of Neosho. The intake structure is located slightly more than 3 miles west of the site. Should it be determined that contaminants are migrating to off-site surface waters, the potential impact on Shoal Creek and the Neosho water system should be further evaluated.

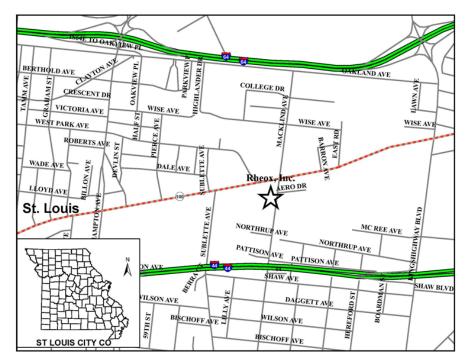
Health Assessment:

Following the removal and cleanup of the site. cadmium levels exceeding the site soil action level were detected only in the concrete sampled from the walls and floors of the sludge-storage vats. Should the concrete not stay intact, exposure to contaminants may occur via ingestion, inhalation and dermal contact with contaminated dust. Cadmium is a known animal carcinogen and a suspected human carcinogen. It attacks the lungs, kidneys and blood. It also produces teratogenic effects. Samples of a residential well located less than 200 feet west of the R&O Processors operations building were collected April 2001, by Missouri Department of Health and Senior Services (DHSS). Lead, cadmium and zinc were found in the samples. The level of zinc was within the limit allowed in public water supplies, but the levels of lead and cadmium exceeded allowable limits. A recommendation was made that the homeowner install a filtration unit capable of removing heavy metals, use bottled water, or hook up to a public water supply. Private wells in the area will continue to be monitored

to ensure this remains an unlikely exposure pathway. In 2003, DHSS again sampled seven (7) wells in this area. Cadmium and zinc levels were within the limits allowed in public water supplies, however, the EPA's action level for lead (15 ppb) was exceeded in one of the samples (24 ppb). In 2005, the DHSS sampled four (4) wells in this area. Zinc levels were within the limits allowed in public drinking water supplies, however, the EPA action levels for lead (15 ppb) and cadmium (5 ppb) were exceeded in one of the well samples. In 2003 and again in 2005, a recommendation was made to the homeowner to install a filtration unit capable of removing heavy metals, use bottled water, or hook up to a public water supply. In 2007 again this person's well sample was elevated for cadmium and lead. The homeowner informed DHSS that a new well would be drilled sometime in the summer of 2007. This new well was sampled for lead. The state laboratory reported the lead concentration in this sample to be below the EPA's action level of 15 parts per billion (ppb).

In 2009 the area was struck by a tornado, and power was lost to most of the wells. Once power was restored only one person granted permission to sample his well. In 2011 it appeared that some of the residents decided not to rebuild, and had abandon their property. Four residents did allow their well to be sampled. No contaminants were detected above established standards. DHSS will continue to sample these wells in the future. One of the old production buildings on this site was damaged by the 2009 tornado. Because this building contained old processing baths, the DHSS made recommendations on safely removing this building, from the site, and cleaning up of the ground's debris. Debris from the building is stored on the remaining building foundation. The house well located on the same property as the old R&O Processors was tested in Aug 2013 and came back nondetect for lead and cadmium. Zinc was detected but was within the limit allowed in public water supplies.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102.



Site Name: Rheox, Inc.

Classification: Class 4

Date of Registry Placement: April 14, 1992

<u>Site Address:</u> 5548 Manchester Avenue, St. Louis, Missouri, Webster Groves Quadrangle

Present Owners: Elementis Specialties

Lead Agency: DNR

Waste Type: Lead

Quantity: Not determined

Site Description:

The Rheox Site is located in an 8.33 acre industrial and commercial area at the southwest corner of the intersection of Macklind and Manchester Avenues. Bordered by two railroad tracks to the south, it is long and narrow and relatively flat. General drainage flows to the south. Several public parks are located within a three-mile radius. Rheox Inc. currently operates a manufacturing plant at the site that was operated by National Lead Industries (NL). NL owned and operated

the site for over 100 years. During past production years, NL fabricated a variety of lead products and conducted lead pigment production processes. The current facility does not use lead in any production process.

The Missouri Department of Natural Resources (the department) documented high lead contamination in the soil. Contamination is a direct result of past manufacturing or disposal practices in an area now used as a parking lot. Soil sampling analyses indicated lead levels in the soil at concentrations significantly above background and Extraction Procedure (EP) toxicity threshold values, characterizing this material as hazardous. The EP toxicity lead concentrations ranged from 6.6 to 168.4 parts per million (ppm).

The owner requested a change of use to excavate into the cap in order to repair a city water line. The department approved the request, and the city water line was repaired in July 2003. The entire site is fenced to restrict access, and a security guard is on site.

Environmental Problems and Areas of Concern Related to Site:

Migration of lead waste off site, via surface runoff or shallow groundwater contamination,

is a potential concern. Capping has decreased this concern. Minor cracks have developed in the parking lot; however, the cap is in good overall condition.

Remedial Actions at Site:

During fall 1992, Rheox capped the leadcontaminated parking lot. A layer of asphalt over an impermeable geofabric liner prevents surface water from percolating through contaminated soils.

General Geologic and Hydrologic Settings:

The Rheox facility is situated in an industrial corridor next to River des Peres. River des Peres is a Mississippi River tributary. As the city grew, the river channel was straightened and the riverbed paved. It is now the main channel for the St. Louis City storm sewer system.

Railroad tracks separate the Rheox Site from the concrete banks of River des Peres. The site is level with only 4 feet of total surface relief. Surface runoff flows into the river or into storm sewer inlets that feed the river.

Lead contamination at the Rheox Site is concentrated in fill material, which averages 6 feet thick across the site. The underlying natural soils are clay-rich, with moderate to low permeability. Perched water is present commonly at the fill-soil interface.

Although site-specific boring information is not available, bedrock is expected to be the Pennsylvanian-age Cheltenham Formation. The Cheltenham Formation is made up of consolidated clays with thin, interbedded coal beds. Clay and coal were mined from most of the area surrounding the site. Open or waterfilled mine cavities may still be present under portions of the Rheox facility. Mine deterioration has created several collapse features just south of the site, and engineering problems associated with mining still exist today. Groundwater recharge to the bedrock is limited. Under present site conditions, groundwater supplies do not appear to be threatened by lead contamination.

Groundwater from bedrock aquifers in St. Louis City is generally high in dissolved solids, and no known water wells are in the vicinity of the site.

The main concern is the potential for off-site migration of lead contaminants via surface water runoff. Mobilized lead or lead-contaminated soil particles entering River des Peres may be deposited in sediment traps downstream or may eventually reach the Mississippi River, about 8 miles downstream of the site.

Public Drinking Water Advisory:

Drinking water to area residents is provided by St. Louis, which obtains water through intakes on the Mississippi and Missouri Rivers. Groundwater is poor quality and not known to be used for drinking purposes. The risk to drinking water systems in the area is, therefore, minimal.

Health Assessment:

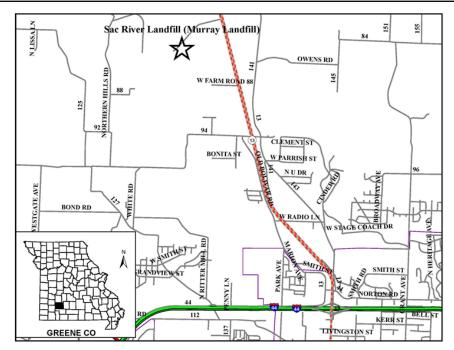
Exposure to lead can cause a wide variety of symptoms and is difficult to diagnose in the early stages. Exposure can cause fatigue, headaches, anemia, constipation, and aching bones and muscles. Chronic exposure can lead to more severe symptoms, including kidney and nervous system damage. These more severe symptoms may be irreversible, particularly in children.

Currently, there are no complete exposure pathways. This could change if excavation were to occur or if the asphalt cap were allowed to deteriorate. The site, however, is fenced and gated to restrict public access.

Based on available information, a potential health risk exists at the Rheox Inc. facility because of the high levels of lead in the soil.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

Sac River Landfill

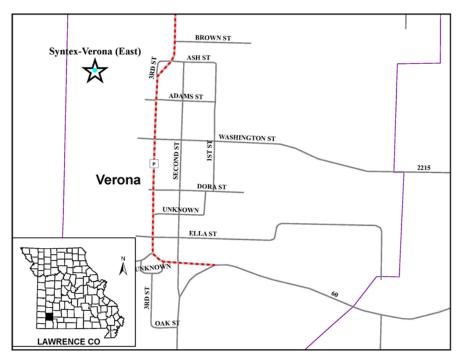


Site Name: Sac River Landfill

<u>Status</u>: Springfield petitioned the Department to delete the site from the Registry. This pending petition is under review by the Department and a final determination is dependent on an environmental covenant being placed on the property.

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Site Name: Syntex - Verona (East)

Classification: Class 4

Date of Registry Placement: January 1,

1984

Date of NPL Listing: September 8, 1983

<u>Site Address:</u> First Street, Verona, Lawrence County, Missouri, SW 1/4, NE 1/4, Sec. 17, T. 26N, R. 26W, Verona Quadrangle

<u>Present Property Owner:</u> BCP Ingredients, Inc.

Lead Agency: EPA

Waste Type: 2,3,7,8-TCDD (dioxin)

Quantity: Not determined

Site Description:

Syntex - Verona (East) Site is an active manufacturing facility located in Verona, Missouri, east of the Spring River. The Site is part of the larger Syntex Facility Superfund Site listed on the U.S. Environmental Protection Agency (EPA) National Priorities List. In 2002, at the request of the property owners, the Syntex Facility Superfund Site

was divided into two separate sites for purposes of the Missouri Registry: The Syntex - Verona (East) Site and the Syntex - Verona (West) Site. The Syntex - Verona (East) Site is where Northeastern Pharmaceutical and Chemical Company (NEPACCO) formerly leased a building to manufacture hexachlorophene and produced dioxin as an unwanted byproduct. This property includes a manufacturing facility and surrounding open space east of the Spring River, and is currently owned by BCP Ingredients, Inc. (BCP). The Syntex - Verona (West) Site is owned by Syntex Agribusiness, Inc. (Syntex) and is west of the Spring River. The Spring River separates the two sites. For remediation and regulatory purposes, the two properties are still treated as one site.

The Syntex - Verona (East) Site is the subject of this Registry listing and is referred to herein as "the Site." It contains five distinct areas of surface or near-surface soil contaminated with dioxin. These were remediated by Syntex Agribusiness, Inc. (Syntex) with oversight by the EPA. The soils portion of the Site received a completion letter from EPA in September 1998. There is no public access, and the Site is restricted to industrial land use.

Environmental Problems and Areas of Concern Related to Site:

With the oversight of the EPA, numerous investigations at and around the Site were conducted to delineate the nature and extent of chemicals of concern. The compound dioxin was identified to be the primary chemical of potential concern in soil necessitating remediation.

No evidence was found that the Spring River is contaminated with dioxin. Analyses of fish taken from the river in 1981, showed dioxin levels that exceeded the United States Food and Drug Administration recommendations for fish consumption. A fish consumption advisory was put into place by the Missouri Department of Health and Senior Services (DHSS) in 1982. Subsequent fish samples showed that dioxin levels had declined, and DHSS removed the fish advisory in 1993, stating that all species of fish anywhere in the Spring River may be consumed in unlimited amounts.

Groundwater sampling activities were conducted by Syntex with oversight by the EPA and the Department of Natural Resources (the department). Acetone, dichlorobenzene, methylene chloride, and other volatile organic substances were detected at low levels in groundwater at the Site. A risk assessment was prepared based on these results and the risk assessment concluded that risks associated with groundwater were within an acceptable range due to the lack of completed exposure pathways.

Remedial Actions at Site:

Remedial actions at the Site included the excavation of soils contaminated with dioxin above an action level pursuant to EPA-approved methodologies, decontamination and disposal of dioxin-contaminated equipment, off-Site thermal treatment of excavated soils and cleaning solutions, and establishment and maintenance of vegetative covers over areas exceeding threshold levels of dioxin. This work was conducted in accordance with the 1988 Record of Decision for soils and EPA oversight, as follows for each area.

The Former Lagoon Area was excavated and

EPA incinerated all dioxin-contaminated soil that exceeded 20 ppb. Syntex backfilled the lagoon and has maintained a vegetative cover.

The Irrigation Area and the Burn Area located west and south of the manufacturing plant, respectively, were filled and vegetative cover has been maintained.

The Slough Area, a storm water runoff area located north of the manufacturing plant, was re-graded and seeded to facilitate drainage. Vegetative cover has been maintained.

The Spill Area was capped with asphalt in October 1995 and the asphalt has been maintained.

The Site's remediated areas do not contain levels of dioxin greater than 20 ppb based on the EPA-approved Facility Implementation Plan and sampling methodologies.

A process was designed to destroy dioxin in waste material left by NEPACCO. This waste material was treated and the fluids from the treatment were incinerated at the EPA's mobile incinerator. Ultimately, all contaminated equipment was decontaminated and related wastes were also incinerated at the mobile incinerator.

In April 1997, a trenching operation to bury elevated power lines uncovered an area of PCB contamination. Under a consent order with the EPA, Syntex excavated the contaminated soil and transported it to the APTUS incinerator in Coffeyville, Kansas. This action was completed in November 1997.

In August 1996, Syntex sold the manufacturing plant and surrounding property east of the Spring River to DuCoa. DuCoa sold the Site to BCP in 2001. Syntex remains responsible for the Comprehensive Environmental Response, Compensation and Liability Act cleanup.

EPA's Fourth Five-Year Review Report, completed in September 2012, noted that based on available data, protectiveness of the remedies for soil and groundwater could not be determined. It was recommended that the entire Site, including both soil and

groundwater, be reevaluated using currently accepted risk levels. EPA's report recommended additional site characterization and risk assessments to assess whether the EPA-approved remedies remain protective.

EPA specified milestone dates of September 2014 for this work. An addendum to the Fourth Five-Year Review Report is anticipated from EPA by September 2015.

General Geologic and Hydrologic Setting:

The Site is located on the Spring River flood plain, which contains numerous abandoned meanders. The meanders consist of gravelly materials, having a higher permeability than the surrounding materials. A portion of the Site sits atop an abandoned channel that was filled prior to plant construction.

Two bedrock aquifers are present at the Site: the shallow Mississippian limestone aquifer called the Springfield Plateau Aquifer, and a deeper aquifer made up of Cambrian- and Ordovician-age carbonates and sandstones called the Ozark Aquifer.

The Springfield Plateau Aquifer is made up of cherty limestones that directly underlie the alluvium. This aquifer supplies limited yields to shallow wells used mostly by individual landowners in the general area. The Mississippian aquifer is subject to contamination from local sources, such as septic tanks and agricultural runoff, either through permeable soil and bedrock or through poorly-cased wells. At this Site, the alluvial materials and the Mississippian bedrock are connected hydraulically. Shallow groundwater flow is generally north-northwest towards the Spring River.

The Ozark Aquifer, present typically at depths greater than 300 to 400 feet, is used to supply major industrial and municipal users in the area. In general, the Ozark Aquifer in this region of the state has not been affected greatly by surface contamination; however, some localized pollution has resulted because of poorly-cased deep wells penetrating both the upper and lower aquifers.

Public Drinking Water Advisory:

Syntex purchased the former Well No. 3 of the Aurora-Verona water system located at the northeast corner of the Site, which is now used only for fire protection by BCP. The nearest existing public well is two miles east of the Site. This is Well No. 4 of the Aurora-Verona water system. This well is cased to a depth of 421 feet and draws water from the Eminence Dolomite, which is part of the deeper Ozark Aquifer. Well No. 3 was sampled and no dioxin or other organic chemicals were found.

Health Assessment:

Dioxin is one of the most toxic substances known; however, its toxicity varies greatly among species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is suspected to cause soft tissue sarcomas, Hodgkin's disease, non-Hodgkin's Lymphoma, and porphyria cutanea tarda.

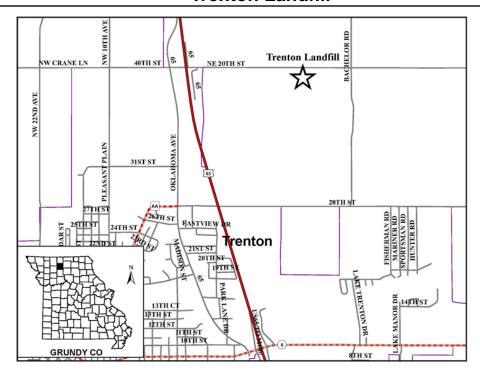
Hexachlorophene's principal effect is on the central nervous system, where it may cause paralysis, blindness and coma. It may also irritate the intestinal tract and can cause an allergic skin reaction. Hexachlorophene is not believed to be carcinogenic but can cause birth defects. Tetrachlorobenzene (chlorinated benzene) is irritating to the skin, conjunctiva, and mucous membranes of the upper respiratory tract. Acute exposure may cause drowsiness, lack of coordination, and unconsciousness. Acute poisoning with 2,4,5-trichlorophenol (TCP) produces decreased activity and causes motor weakness. Convulsive seizures can also occur. The 2,4,6-TCP isomer of the trichlorophenols is considered to be carcinogenic.

Routes of exposure include ingestion of contaminated water, direct exposure to the contaminated soil, or inhalation of contaminated dust. Access to the site over land is limited, but the site is easily accessible via the Spring River. Fish are now considered safe to eat because sampling has shown that dioxin levels are no longer of health concern.

Based on available information, a threat to the public health exists. Remedial activities have lessened the human health risk from the site.

The site reassessment required by the Fourth Five-Year Review will more accurately determine remaining site risk, and whether additional remedial action is necessary for the site remedy to be protective of human health and the environment.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: Trenton Landfill

Classification: Class 4

Date of Registry Placement: June 10, 1992

<u>Site Address</u>: Northeast of the city of Trenton, east of Highway 65 in Grundy County, Missouri, NE 1/4, NW 1/4, Sec. 10, T. 61N, R. 24W, Trenton Quadrangle

<u>Present Property Owner</u>: Connie S. Gwinnup and Anthony Clifford Droz

Lead Agency: DNR

Waste Type: Heavy metals, paint waste, and

herbicides

Quantity: Not determined

Site Description:

The city of Trenton used this site, which is about 40 acres in total size, as a sanitary landfill from 1959 until its voluntary closure in 1979. Around 1980, the city graded and seeded the site. The property is now privately owned. In 1985, elevated levels of heavy metals were documented in Muddy Creek downstream from the landfill. This discovery

prompted the Missouri Department of Natural Resources (the department) to investigate the landfill as a potential source. These investigations determined that a large quantity of hazardous waste was disposed of during the life of the landfill. These wastes included chromic acid sludge, paint waste, and herbicides. Today, the property exists as an open field. As part of the stabilization of the site, it was planted with native grasses, trees and forbs.

The property is located in a predominantly rural agricultural area. Access to the site is unrestricted.

Environmental Problems and Areas of Concern Related to Site:

In the past, sediment samples indicated that hazardous substances from the landfill impacted Muddy Creek. The site has potential for off-site migration of waste constituents via shallow groundwater. Erosion of the cap and leachate outbreaks have been a concern in the past.

Remedial Actions at Site:

In 1980, the site was graded and seeded. Department inspections in 1997 and 1998,

indicated that the cap had subsided in locations throughout the landfill. Two drainage ditches had eroded, one severely, exposing solid waste, hazardous substances, and hazardous waste. Two leachate outbreaks also were noted.

The potentially responsible parties (PRPs) and the department agreed to a two-phase stabilization project to address the erosion and the subsidence. Phase I, completed in July 1999, consisted of an engineered biological design to stabilize the ditch running along the southern edge into Muddy Creek.

In spring 2000, a well-established vegetative cover was observed within the drainage ditch and in the areas outside of the stabilized ditch. Evidence of moderate to high flow was noticed in the area of riprap, but no erosion was evident.

The landfill surface was stabilized in the fall of 2000. A site inspection in 2001, found that the site was mostly vegetated with some evidence of erosion and minor surface ponding. No leachate outbreaks were visible at that time. Subsided areas were filled in order to halt ponding and surface water infiltration. Grasses and trees were planted in 2001. The last phase of the project included revegetation of the western half of the site with native and agricultural grasses and enhancement of the riparian corridor with tree plantings. In May 2002, department staff inspected Phase Il activities and found that the landfill cap was re-vegetated and nearing stability. Tree plantings were complete and surviving. Some minor repairs to the drainage channel and stabilization of two areas of slight rill erosion were identified at that time and later fixed.

A Closed Landfill Inspection and the annual Registry Site Inspection conducted in May 2004 noted some problems, including subsidence causing ponding, erosion cutting back into the riparian zone exposing trash, leachate entering Muddy Creek, and some undesirable woody vegetation. The department notified the city of Trenton, which plans to take the necessary action to correct these problems in the fall of 2004.

General Geologic and Hydrologic Setting:

The Trenton Landfill is located in the Dissected Till Plains physiographic region of northern Missouri. The site is located on the western slope of a rolling upland adjoining Muddy Creek, which flows along the western boundary of the site.

Much of Grundy County is covered by glacial drift, a heterogeneous, unconsolidated deposit of clay, sand, gravel and boulders. Some of the sands in the lower layers of the till form permeable beds of limited lateral and vertical extent. These lenses are a source of poorquality drinking water for several wells within 2 miles. The till underlying the site is expected to be more than 100 to 150 feet thick. Flow of any groundwater existing in the sand lenses of the lower till likely is to the southeast.

The fine-grained, low permeability sediments beneath the site should retard the downward movement of surface water and leachate, reducing impacts to groundwater. However, if sand lenses are present in the till, contaminant movement and migration within groundwater will be enhanced.

Bedrock beneath the landfill is probably shale and sandstone of the Cherokee Group, which is about 435 feet thick at Trenton. Minor amounts of clay, coal and limestone also occur in the Cherokee. In fact, an undulatory bed of coal was mined at the Trenton Mine, one mile southeast of the landfill. In general. the large shale content of most Cherokee strata greatly impedes the flow of groundwater. The basal member of the Cherokee Group is a water-bearing sandstone more than 100 feet thick, and, in southeast Grundy County, water from this layer is suitable for livestock. However, low yields and high dissolved-solids content of the bedrock aquifer make it unsuitable for most uses.

Public Drinking Water Advisory:

The source of drinking water for the city of Trenton is the Thompson River. The Trenton Landfill is located 3.4 miles from the water intake. Drainage from the site flows to Muddy Creek, which enters the Thompson River several miles downstream of the water supply

intake. Therefore, the site poses no direct threat to the city's public water system. Although the site does represent a threat to shallow groundwater, use of groundwater for drinking purposes is very limited, due to the poor quality of the water and the presence of a rural water district, Grundy County Public Water Supply District (PWSD) No. 1.

The source of water for Grundy County PWSD No. 1 is the city of Trenton.

Health Assessment:

Landfill records indicated that numerous chemicals associated with waste oils, wastewater treatment sludges, heavy metal sludges, paint sludges, solvents, and acid cleaning solutions may be present in the landfill. High concentrations of metals were at one time identified in Muddy Creek. The current chemical composition and concentration of chemicals and metals in the landfill soils, landfill runoff, and water and sediment of Muddy Creek are unknown. Some contaminants may also be bioaccumulative.

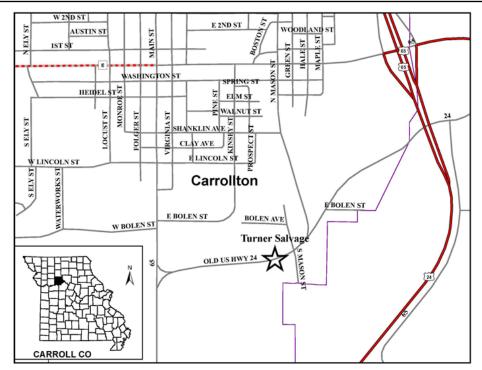
Potential human exposures to site-related contamination may occur from contact with exposed debris, subsurface and surface soils, surface water runoff, leachate, shallow groundwater, and surface water. Persons directly exposed to the site may include trespassers and maintenance workers. Potential exposure to leachate within water and sediment of the Muddy Creek includes recreational use and irrigation. The

ephemeral nature of Muddy creek may expose persons involved in recreational activities including swimming, wading, and fishing. Wildlife, livestock, and fish may become contaminated due to exposure to contaminated surface water adjacent to and downstream of the site. Bioaccumulation of heavy metals in the aquatic food chain could contaminate fish, thus a potential exposure pathway exists via local fish consumption.

Exposure to contaminated groundwater used as a potable water source is not likely. Based upon geologic and hydrologic investigations, downward movement of contaminants is unlikely. Also, an investigation by the Missouri Department of Health and Senior Services (DHSS) revealed that no private wells exist within one mile of the site.

Based on available information, a potential health threat exists from this site. Exposure to site-related contamination may occur through direct contact to contaminated soils, leachate, and debris at the site. Exposure to contaminants by humans and wildlife exposed to Muddy Creek is likely. Therefore, DHSS recommends that exposure be minimized by maintenance of the site's soil cap and groundcover, and water and sediment be tested for site-related contamination.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



<u>Site Name</u>: Turner Salvage (formerly Tonnar

Salvage)

Classification: Class 3

Date of Registry Placement: May 16, 1997

<u>Site Address:</u> Hwy. 24/65, Carrollton, Carroll County, Missouri, SW 1/4, NW 1/4, Sec. 4, T. 52N, R. 23W, Carrollton East Quadrangle

Present Property Owners: Advantage

Metals Recycling, LLC

Lead Agency: EPA

Waste Type: Ignitable materials, volatile organic compounds (VOCs) (toluene, ethylbenzene, xylenes, 2-butanone, and benzene), trichloroethylene (TCE), and metals (chromium, lead, and beryllium). PCB-containing transformers, and asbestoscontaining materials are also present on site.

Quantity: Not determined

Site Description:

The Site was operated as a salvage yard until approximately October 2008. The Site is currently closed and is located in a

commercial and residential area on the southeastern boundary of the city of Carrollton.

After a fire at the site, Missouri Department of Natural Resources (the department) staff inspected and sampled the site.

Environmental Problems and Areas of Concern Related to Site:

The site is within the 10-year flood plain of the Missouri River. Shallow groundwater below the site and sediments immediately downstream of the site are contaminated with lead.

Residual soil contamination remains at several locations. The area is bounded on the south and east sides by Standley Branch Creek which discharges into Wakenda Creek 0.25 miles from the site. Wetlands are associated with both waterways.

Remedial Actions at Site:

In August 1996, based on a Pre-Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Site Screening (SS), the department concluded that the site should be listed on CERCLIS.

The department requested that the U.S. Environmental Protection Agency (EPA) evaluate the site for a time-critical removal action. The EPA completed a Removal Assessment in December 1996.

The EPA conducted additional site investigation and sampling in January 1997. In November 1997, the EPA and Tonnar Salvage entered into an Administrative Order on Consent for removal action. In April 1998, the EPA approved Tonnar Salvage's work plans for the removal action.

Tonnar Salvage and its representatives conducted a Superfund removal action in December 1998. Containerized hazardous wastes and used oil originally identified at the site were removed and disposed off site during the removal action. The remains of containerized paint from the burned barn area were collected and containerized. These wastes were characterized as hazardous wastes based on the toxicity characteristic for lead. This waste was disposed off site at a hazardous waste facility and was the last of the containerized hazardous waste to be removed from the site during the removal action.

Isolated areas of contaminated soils that were identified for the removal action were excavated with the resulting wastes being characterized and transported for disposal as nonhazardous wastes. These included the oil spill area south of the Tonnar Salvage Garage on the south side of the highway; lead contaminated soil near the burned barn; TCEcontaminated soil south of Building C; and oil-contaminated soil near the metal compactor and baler. However, some areas of potential concern remain. These include the oil spill area south of the Tonnar Salvage Garage that continues to show elevated Total Petroleum Hydrocarbon levels although it is apparently underlain by an asphalt surface; an area between Buildings A and B not addressed during the removal action where elevated beryllium levels were detected in department and EPA samples; apparently recent oil contamination in the area of the compactor and baler identified during the department's annual inspection; an area near the west edge of the site that is devoid of vegetation; and a former transformer

processing area that EPA sampling determined contains PCBs.

Other nonhazardous solid wastes were removed and disposed off site, including asbestos-containing materials, empty drums and containers, and other miscellaneous materials. Also removed were three transformers which were delivered to the city of Carrollton for reuse, and several compressed gas cylinders which were to be reused or disposed as appropriate. A number of containers of asphalt sealer containing TCE were determined to be useable product and placed back into the facility's active inventory. Containers of useable oil and grease were also noted at the site. These were removed by Heritage Environmental in October of 2011

Hazardous substances may remain on site. However, the department's Hazardous Waste Program completed an Expanded Site Investigation (ESI) on September 25, 1998 which recommended no further remedial action at Tonnar Salvage for the following reasons: no evidence of contaminants affecting nearby drinking water wells exists; no evidence exists of contaminants migrating to nearby wetlands and fisheries; and site contamination is being addressed under a removal action. The shallow groundwater sample collected in the vicinity of the compactor and baler during an integrated Preliminary Assessment/Site Inspection contained 181 parts per billion lead which exceeds the state water quality standard and the EPA's drinking water action limit for lead of 15 parts per billion (ppb).

However, the ESI concluded no evidence of impact on drinking water wells exists.

In 2000, the EPA approved Tonnar's "Removal Compliance Report" documenting the removal action conducted under an Administrative Order on Consent. The EPA plans no further remedial or removal actions.

At the May 2013 inspection, the City of Carrollton had excavated a portion of the east side of the property and installed a 30 inch sewer line and manholes. The City also worked along the north portion of the property. Soil stockpiles were located along

the south portion of the property and additional grading had been conducted. Following the inspection, a sinkhole approximately six feet wide by six feet deep had opened up in the north central portion of the property due to a compromised active sewer line. The top of the sewer line collapsed and over time carried the soil away creating the sinkhole.

By July 2013, the installation of the sewer line was complete. The soil stockpiles located along the south portion were spread out across the property and regraded. No soil was removed from the site.

General Geologic and Hydrologic Setting:

The site is located on alluvium of the Missouri River floodplain. The 50- to 100-foot thick alluvium consists of low-permeability, finegrained clay and silt at the surface, grading with depth to coarser sand and gravel units with high permeability. Sand units are encountered typically within 20 feet below grade, and the gravel seams are present nearer the alluvium/bedrock contact. Depth to the water table is about 15 feet. The alluvial aquifer, which is an important source of potable water for local inhabitants, is in direct hydraulic communication with the Missouri River.

Under normal flow conditions, groundwater beneath the site flows south to southeast toward the Missouri River, while surface water runoff enters the Standley Branch of Wakenda Creek, a stream located south of the facility. Wakenda Creek, a gaining stream, may also be in direct hydraulic communication with the Missouri River alluvial aquifer. The site is subject to occasional flooding from the creek and the river. Release of contaminants would readily affect the alluvial aquifer through direct infiltration.

The bedrock beneath the site is composed of Pennsylvanian-age limestones. Since the bedrock exhibits low permeability, release of contaminants would have minimal effect on the bedrock aquifer. Due to the mineralization of water within the bedrock, this aquifer is not used as a water source. Release of dense non-aqueous phase liquids would be expected to impact the base of the alluvial aquifer,

potentially migrating along the top of bedrock, which slopes toward the southeast.

Public Drinking Water Advisory:

Five wells serving the city of Carrollton are 1 mile west of the site, and a sixth well is 1.5 miles to the southwest. These wells are on the south side of Wakenda Creek and are between 60 and 120 feet deep. The effect of this site on the well field is unknown.

Health Assessment:

The primary contaminants of concern include PCBs, asbestos, toluene, ethylbenzene, xylene, 2-butanone, chromium, beryllium, lead, TCE and xylene. Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants.

A determination was made that contaminants are not migrating to the municipal water supply. However, because of the uncontrolled nature of the wastes, this site may continue to present a public health threat. The site borders a stream, is near a wetland, and is in the Missouri River floodplain. Waste has been placed right up to the bank of the stream. Municipal wells are located within one mile. Also within a mile, a few unused private wells are present at unoccupied residences. The previous owners conducted illegal open burning as recently as 1996. Therefore, as a result of these conditions, surface water, groundwater, sediment, air, and soils are all potential exposure media.

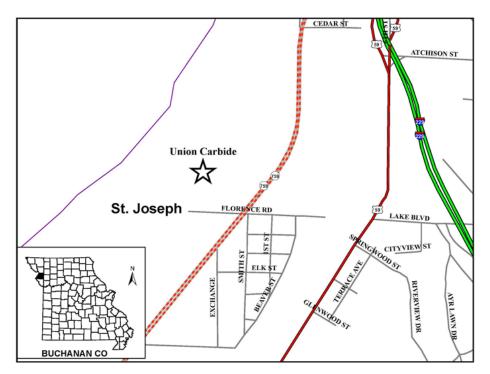
In 1996, the owner removed some debris and was in the process of removing some contaminated soil in areas affected by petroleum products. The outcome of this removal action is unknown.

According to the department's Registry annual site inspection dated May 13, 2008, clearing of the land continues, and the vehicle crusher is not operating while collection mechanisms for recovery of vehicle fluids are being installed. Both activities are necessary to minimize further contamination of site soils. Additional sampling of contamination in soil, surface water, sediment, and groundwater

contamination is needed to determine if contaminants are present at concentrations that may cause adverse health effects on and off site.

Until remediation is complete, this site will continue to pose a potential health threat. Expansion of this site, including removal of cover, should not occur until the extent of contamination of the site soils, surface water, sediment, and groundwater has been delineated.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P.O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: Union Carbide

Classification: Class 4

<u>Date of Registry Placement</u>: December 12, 1996

<u>Site Address</u>: 317 West Florence Road, St. Joseph, Buchanan County, Missouri, SE 1/4, Sec. 19 T. 57N, R. 35W, St. Joseph South Quadrangle

Present Property Owner: Union Carbide

Corporation

Lead Agency: DNR

Waste Type: 2,3,7,8-TCDD (dioxin), 2,4,5-T

Quantity: Not determined

Site Description:

In 1956, Amchem Products began operation of a herbicide formulation and metalworking products facility in St. Joseph on a parcel of 7.84 acres. Amchem formulated herbicides that primarily contained the active ingredients 2,4-D and 2,4,5-T. These formulations sometimes produced the unwanted byproduct dioxin. The facility ceased formulating these

herbicides in 1975.

Soon thereafter, Union Carbide purchased the property and formulated other herbicides. In 1986, Rhone-Poulenc bought the herbicide formulation facility. The company acquired only the property (2.5 acres) that contained the facility. Union Carbide retained the remaining 5.34 vacant acres of which only 3.80 acres remains on the Registry. In December 1997, Rhone-Poulenc sold the 2.5-acre property and facility to Nufarm Inc.

Contamination at the two properties dates from between 1956 and 1975, when herbicides containing dioxin were formulated. Spills near the rail siding contaminated the Nufarm Site. A lagoon used for disposal of waste from 1956 until 1975, on the property retained by Union Carbide is the source of contamination.

The Union Carbide Site is north of the Nufarm Site. Both properties are listed on the Registry. The Union Carbide Site is capped, well-vegetated with grass and is enclosed by a 6-foot, chain-link fence with barbed wire around the top. The former lagoon area can only be accessed by crossing through the Nufarm property. The Missouri River is about 50 yards from the western boundary. Railroad

tracks are situated between the site and the Missouri River. The site is located in a heavily industrialized area and access is controlled.

Environmental Problems and Areas of Concern Related to Site:

The site is located in the flood plain of the Missouri River, which is about 50 yards away. There are residential areas less than one-half mile southeast and less than a mile north.

Remedial Actions at Site:

A lagoon was used for disposal of wastes from 1956 until 1975. In 1975, the lagoon was drained and filled. Samples of the water from the lagoon taken prior to its closure revealed only traces of heavy metals and phenols. No further action was taken at that time.

A 1983 Resource Conservation and Recovery Act inspection by the Department of Natural Resources (the department) suggested that the lagoon be resampled. In 1986 the U.S. Environmental Protection Agency (EPA) conducted sampling of the former lagoon. Individual soil grab samples revealed concentrations of dioxin as high as 49 ppb at the surface. In 1988 Union Carbide contracted Pacific Environmental Services to conduct more extensive sampling. Dioxin was found as high as 16 ppb (0-6 inches) and 76 ppb (6-20 inches) in composite soil samples.

In December 1997, Union Carbide petitioned the department director for a change in site classification. In order to evaluate the Union Carbide claim, the department required further investigation and remediation. Union Carbide's Verification Sampling Plan was approved by the department. In October, 1998, Union Carbide conducted sampling. Three groundwater monitoring well samples and two sediment samples were collected and analyzed for 2,4-dichlorophenoxyacetic acid: 2,4,5-trichlorophenoxyacetic acid; Silvex (2,4,5-trichlorophenoxypropionic acid) and dioxin. None of the sample results exceeded regulatory limits for any of the contaminants of concern. Therefore, the site was reclassified as a Class 3 site.

In June 2001, the Hazardous Waste Program approved a cap work plan submitted by Union

Carbide Corporation. The remedial construction was completed in July 2002, and consisted of laying a drain pipe in the stormwater ditch on the east side, placing a compacted clay cap one to two feet thick over the contaminated area, placing a 10-foot wide clay apron around the perimeter of the clay cap, and placing a 6 inch topsoil layer over the cap to support a vegetative cover. A fence was also moved to correspond with the southern property boundary. Union Carbide will provide ongoing maintenance and inspection of the cap and vegetative cover. Survey markers have been installed to delineate the cap, cap apron and buffer zones. Because of construction of the cap. the site was reclassified to a Class 4.

In the fall of 2002, Union Carbide requested and the department approved a reduction in the area of the site listed on the Registry. The site was reduced to the surveyed 3.80-acre area that includes the cap, cap apron and buffer zones. The 1.54-acre area to the north was removed from the Registry because sampling has shown that hazardous waste is not located on that property.

General Geologic and Hydrologic Setting:

The site is located on alluvium of the Missouri River floodplain. The 60- to 100-foot thick alluvium consists of low-permeability, fine-grained clay and silt at the surface, grading with depth to coarser sand and gravel units with high permeability. Sand units are encountered typically within 20 feet below grade, and the gravel seams are present nearer the alluvium/bedrock contact. Depth to the water table is 10 to 20 feet. The alluvial aquifer, which is an important source of water for local industry, is in direct hydraulic communication with the Missouri River.

Under normal flow conditions, groundwater beneath the site flows west toward the Missouri River. The site is subject to occasional flooding from the river. High river stages could reverse the groundwater flow direction. High-yield wells in the vicinity may also affect the direction of groundwater flow. Release of contaminants could affect the alluvial aquifer through direct infiltration.

The bedrock beneath the site is composed of

Pennsylvanian-age limestones. Since the bedrock exhibits low permeability, release of contaminants would have minimal effect on the bedrock aquifer. Due to the mineralization of water within the bedrock, this aquifer is not used as a water source.

Public Drinking Water Advisory:

The site is downstream from St. Joseph's former drinking water river intake and the new drinking water well field. No other sources of public drinking water are in the area, and none should be affected by this site.

Health Assessment:

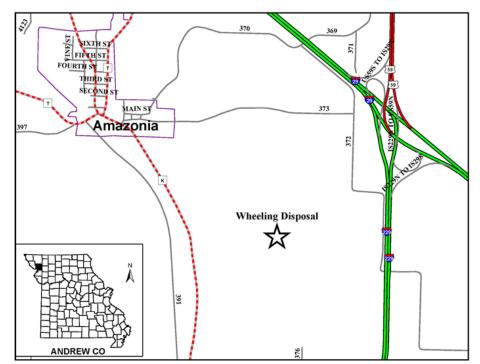
The Union Carbide site is a former chemical manufacturing site for phenoxyacetic acid herbicides. The property is located in an industrial area off of Missouri State Highway Route 759, in Buchanan County, St. Joseph, MO. The site, which is now owned by Nufarm Inc., comprises approximately 7.5 acres, and has been utilized by Union Carbide since 1956. The site contains one building (40,000 square feet), 2 railroad sidings, loading platform, tank farm and a capped fenced secure former lagoon area.

Soil samples collected in 1985 showed concentrations of 2,4-D, 2,4,5-T, and Silvex,

as well as 2,3,7,8-TCDD (dioxin). The highest concentrations on the Union Carbide area were 2,4-D, 57.7 parts per million (ppm); Silvex, 7.4 ppm; dioxin, 76 parts per billion. Dioxin is one of the most toxic substances known, although its toxicity varies greatly between species. Animal studies have shown that dioxin produces acnegenic, fetotoxic, teratogenic, mutagenic, carcinogenic, and immunogenic effects. In humans, it is known to have an acnegenic effect (chloracne). It is also suspected to cause soft tissue sarcoma, non-Hodgkin's Lymphoma, Hodgkin's disease, and porphria cutanea tarda.

Based on the soil sample results and its proximity to another Registry site (NuFarm), a potential health risk exists at this site.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.



Site Name: Wheeling Disposal

Classification: Class 4

<u>Date of Registry Placement</u>: January 1, 1984

<u>Site Address</u>: Along County Road K, about 1 mile southeast of Amazonia, Andrew County, Missouri, NE 1/4, Sec. 6, T. 58N, R. 35W, Savannah and St. Joseph North Quadrangles

<u>Present Property Owner</u>: Wheeling Disposal Service Company, Inc.

Lead Agency: EPA

<u>Waste Type</u>: Pesticides, paint and tanning sludges, neutralized acids, metals, arsenic, and cyanide

Quantity: Estimated 4,662 cubic yards remain on site.

Site Description:

The site is near Amazonia in rural Andrew County. This entire site was a former municipal and industrial landfill that consists of two adjacent parcels of land totaling 200 acres. Wheeling Disposal Service Company

began operating in the St. Joseph area in 1964. During the early 1970's, the company opened a 10-acre area for industrial waste disposal. Industrial waste was accepted until May 1987. The site was covered with soil, graded and reseeded in 1987. Presently, the landfill is well-vegetated. The entrance to the landfill is posted with warning signs and secured with a locked gate and four-wire fence.

Environmental Problems and Areas of Concern Related to Site:

Large quantities of hazardous waste were buried in several cells at the site. Prior to installation of the remedy, the cells were not properly covered and leachate infiltration caused groundwater contamination. Although the remedy has effectively stopped infiltration, groundwater contamination will not be attenuated for many years.

Regulatory limits for various hazardous substances in groundwater were exceeded several times at several compliance points listed in the Record of Decision (ROD).

Although annual sampling has indicated that off-site migration has not occurred, the possibility exists that contaminants could

leave the site via groundwater or surface water originating from springs near the site.

Remedial Actions at Site:

The operator installed five groundwater monitoring wells along with a sixth, downgradient well. Through 1986, semi-annual water samples were collected, and analysis showed significant variations in aluminum and conductivity in two established wells. The owner formally closed the site in 1986.

Completed closure activities included the following:

- 1. Additional cover application and grading of the old sanitary landfill;
- 2. Final covering and contour grading of the special waste trench disposal area;
- Filling and grading the former atrazine disposal impoundment. According to facility personnel, all the water evaporated from the impoundment before it was filled. No sludge or residual materials were extracted. Estimated depth of cover is 4 to 5 feet. The slope of the covered area is less than 3 percent;
- All former special waste disposal trench areas, including the wire rope sludge pit, were covered with at least 4 feet of soil and graded to contour;
- All areas which exhibited past significant erosion were filled and graded to contour with existing slopes;
- All covered areas were terraced every 40 to 50 feet of vertical height (80 feet of vertical lift from the landfill base to the access road). Adequate drainage and slope has been established to provide enhanced runoff and minimize cover erosion.

In September 1988, six Responsible Parties (RPs) signed an Administrative Order to conduct a Remedial Investigation/Feasibility Study (RI/FS). In July 1990, the RI was completed by the RPs' contractors. Groundwater monitoring conducted during the RI indicated that shallow groundwater in the vicinity was contaminated with various volatile organic compounds. The RI also indicated that shallow groundwater contamination had not migrated off site. Surface and subsurface

soil sampling indicates slightly elevated levels of chromium.

In September 1990, the U.S. Environmental Protection Agency (EPA) completed a ROD listing the following activities as necessary for remediating the site: (a) upgrading of the existing cover over the disposal area to comply with state and federal standards; (b) long-term monitoring of groundwater and surface water; (c) implementing site maintenance activities; (d) installing security measures (warning signs and/or fences); and (e) closing certain on-site wells. The PRPs completed these activities in the summer of 1994.

Installation of a vinyl cover over most of the landfill cells and reestablishment of vegetative cover was completed in July 1994. Groundwater and surface water monitoring is ongoing.

In 1998, the EPA ordered the RPs to determine the consequences of newly identified contaminants found in unexpected areas. Additional response actions included a Geoprobe® groundwater investigation and inspection of ravines for groundwater discharge to surface water locations. The RP's consultant concluded that migration of contaminants will not affect nearby groundwater users since their well intakes end at higher elevations than the bottom of the ravines nearest to the waste cells. Although the ravines cut off contaminated groundwater migration, the RPs will monitor the ravines in case of future contaminant migration to these areas. The EPA also required modification of the monitoring program to add a new groundwater well and several surface water locations.

The EPA completed a Five-Year Review in September 1999. Analytical results from groundwater and surface water monitoring conducted in May 1999 indicated that contamination had not migrated off site. Based on site inspection observations and the review of analytical sampling results, the remedy continued to be protective of human health and the environment. The trustees for the Wheeling Disposal Site submitted a "Five Year Historical Review Report and Proposed Annual Monitoring Program."

The site was officially delisted from the National Priorities List (NPL) on October 30, 2000.

A Second Five-Year Review inspection was conducted in June 2003. All remedial actions at the site were observed to be in place and functioning effectively. The Second Five-Year Review was issued in September 2004 and found the remedy for the site to be protective of human health and environment.

Landfill settlement and erosion repair activities were performed at the site from July 31, 2008 to August 5, 2008. Settlement repairs were completed for three areas located within the northwest cell of the landfill, and erosion repairs were completed for one letdown channel located on the southwest cell of the landfill. In January 2009, the Third Five-Year Review site inspection found both repairs to be in good working order.

In May 2009 EPA completed the Third Five-Year Review which found the remedy at the site to be constructed in accordance with the requirements of the ROD and functioning as designed. The remedy was found to be protective of human health. In addition, sampling results indicated that off-site migration of contaminants had not taken place. The Third Five-Year Review found the remedy to be protective of the environment under past guidance, but it recommended an updated ecological assessment to ensure environmental protectiveness.

In 2010, a Screening Level Ecological Risk Assessment (SLERA) was conducted and indicated that the contaminants on-site are not likely to impact wildlife drinking water from the seeps. Two seeps nearest the source at the landfill may have metals and pesticide concentrations at levels which impact the growth and reproduction of invertebrate populations. Since none of the pesticides or metals at the site are bioaccumulative, the potential exposure to insectivores is limited.

The Fourth Five-Year Review site inspection was conducted on November 14, 2013. The site inspection determined that all remedial actions at the site were observed to be in place and functioning as designed. The Fourth Five-Year Review Report was

completed and finalized in May 2014. The remedy for the site was found to be protective of human health and the environment. The next Five-Year Review will be due in May 2019.

As part of the Operation and Maintenance plan set forth in the Consent Decree, the PRPs continue to perform annual sampling and bi-annual site inspections.

General Geologic and Hydrologic Setting:

On-site soils are composed of 50 to 70 feet of moderately permeable loess overlying glacial drift. The glacial drift varies from silty sand to sand. Boring information obtained near the site indicates water-bearing sand at depths of 27 to 38 feet below the surface.

Depth to bedrock at the site is highly variable, ranging from 100 to 200 feet below ground surface. The bedrock is composed principally of low-permeability shales and limestones. The potential exists for downward migration of contaminants through the loess to the more permeable sand unit. Should such vertical migration occur, horizontal migration through the sand to off-site locations is possible. Contaminants may also migrate horizontally through the loess material, eventually discharging to surface water in nearby ravines.

Public Drinking Water Advisory:

The site is located within 1 to 2 miles of the wells for Amazonia and Savannah, which serve about 4,600 people. The wells, located in the Missouri River alluvium, are gravel-wall wells, 90 to 100 feet in depth. Depending on the hydrogeology of the area, the hazardous waste site may represent a threat to the alluvial aquifer.

Health Assessment:

Wheeling Disposal is a former municipal and industrial landfill located in Amazonia, Missouri, a small rural town in the southwest corner of Andrew County. The site began operating in 1964 and the acceptance of industrial waste began in the early 1970's. From 1975 to 1986 this site, accepted leather tanning sludge, pesticides, asbestos,

laboratory waste, building debris, paint sludge, battery wastes, cyanide waste and miscellaneous crushed drums from numerous area companies. The following are the major contaminants of concern: aluminum, arsenic, barium, manganese, lead, sodium, benzoic acid, 2-butanone, 1,2-dichloroethane, 1,1,2-trichloroethane, ethylene, 1,1-dichloroethane, trichloroethylene, bis(2-ethyhexyl)phthalate, bromodichloromethane, carbon Tetrachloride, chlorodibromomethane, chloroform, DDT, dieldrin, heptachlor, thimet, and toxaphene.

Please refer to the Health Assessment Chemical Table in Appendix A for a description of the potential adverse health effects associated with these contaminants. Ingestion of contaminated ground and surface water is the primary exposure pathway at this site. Surface drainage from this site occurs to the north into Mace Creek and to the south into a tributary of Dillon Creek. Groundwater from the site also appears to emerge as springs flowing into these streams. Monitoring has detected barium; cadmium; 1,1dichloroethane: 1.2-dichloroethane: chloroform; ethylene dibromide; carbon tetrachloride, and trichloroethylene in one spring.

Public water availability has reduced the risk of human exposure from contaminated groundwater. Although remedial activities performed in the summer of 1994, have reduced the potential exposure, contamination remains on site and further characterization is necessary. Samples collected by the EPA and the Missouri Department of Health and Senior Services (DHSS) in 1986 and 1987 found volatile organics in one spring near the site. EPA samples contained concentrations of carbon tetrachloride, trichloroethylene, and 1,2-dichloroethane above 5,000 ppb. This spring is no longer used as a drinking water source.

Based on available information, a health threat exists at this site. Off-site migration of wastes have occurred. Contaminants detected during sampling of private wells in 2005, 2007, 2009 and 2011 were below the establish standards. During the Third Five-Year Review in May 2009, EPA identified the need for a Screening Ecological Risk Assessment. Sediment sampling was added

to the existing list of annual monitoring parameters at the site. EPA also requested for a work plan for Cr (VI) investigation for surficial soils. A workplan was submitted to EPA in February 2010 and sampling for the work plan and the ecological risk was conducted the same year. Past investigations at the site evaluated total chromium in soil but did not specifically evaluate Cr (VI). Site soils and sediment were therefore evaluated for hexavalent chromium. DHSS reviewed and evaluated the sampling data. Based on the data presented, and in light of the institutional controls (ICs) that are in place to prevent the development of the area into residential or industrial uses, the site does not appear to present significant risk for the media and pathways evaluated.

For more information regarding health-related issues, please contact the Missouri Department of Health and Senior Services, P. O. Box 570, Jefferson City, MO 65102, (573) 751-6102.

APPENDIX A HEALTH ASSESSMENT CHEMICAL TABLE

HEALTH ASSESSMENT CHEMICAL TABLE

CHEMICAL	POSSIBLE HEALTH EFFECTS
Acetone	Irritant to eyes, skin,respiratory system, and central nervous system (CNS). May cause dizziness, headache, nausea and vomiting.
Actinium	See Uranium health effects
Alachlor (Lasso)	Probable human carcinogen; liver damage possible.
Aldrin	Probable human carcinogen, animal teratogen. TargetsCNS, liver, kidneys, and skin.
Aluminum	Replaces calcium in bone, implicated in Alzheimer's disease.
Anthracene	Respiratory irritation and skin damage.
Antimony	Irritant of eyes and lungs; can cause heart problems, stomach pain and ulcers, diarrhea, vomiting; animal carcinogen.
Arsenic	Known human carcinogen. Skin irritation; digestive system disturbances.
Atrazine	Possible human carcinogen; may cause heart, liver, kidney and peripheral nervous system damage.
Barium	Targets respiratory system, CNS. May cause abdominal cramps, difficulty breathing, vomiting, and diarrhea.
Benzene	Known human carcinogen; animal carcinogen; suspected animal teratogen.
Benzo(a)anthracene	Probable human carcinogen. Targets respiratory system, skin, bladder, and kidneys.
Benzo(a)pyrene	Probable human carcinogen. Targets respiratory system, skin, bladder, and kidneys.
Benzo(b)fluoranthene	Probable human carcinogen.
Benzo(ghi)perylene	Insufficient data.
Benzo(k)fluoranthene	Probable human carcinogen.
3,4-Benzofluoranthene	Insufficient data.
Benzoic acid	Targets eyes, skin, and mucous membranes.
Beryllium	Known human and animal carcinogen. Targets lungs, heart, liver, kidneys, spleen, skin, and eyes.
Beta-hexachlorocyclohexane	Possible human carcinogen.
Bis (2-ethylhexyl) phthalate	Known animal and probable human carcinogen. May cause respiratory and gastrointestinal illness.
Bromodichloromethane	Suspected animal carcinogen; unknown health effects in man.
2-Butanone	Targets the lungs, nose, throat, eyes, skin, and CNS.
Butyl benzyl phthalate	Possible human carcinogen.
Cadmium	Probable human carcinogen; attacks lungs, kidneys, and blood; produces teratogenic effects in animals.
Carbon Tetrachloride	Known animal carcinogen; suspected human carcinogen. Targets liver, kidneys, and CNS.
Chlordane	Known human and animal carcinogen. Targets CNS, eyes, lungs, liver, kidneys and skin.
Chlorobenzene	CNS depressant; attacks lungs, liver and kidneys.
Chlorodibromomethane	Unknown health effects in man.
Chloroform	Known human carcinogen. Hepatic and renal damage and CNS depressant.
Chromium	Known human carcinogen respiratory system damage; liver and kidney effects; toxic effects vary with valence state;
Chrysene	Known animal carcinogen; probable human carcinogen.
Cyanide	CNS depression. Digestive system disorders and cardiovascular system damage.
2,4-D	Weakness, stupor, hyporeflexia, muscle twitching, convulsions, and dermatitis. Targets the liver, kidneys, and CNS.

DDT.DDD.DDE	Probable human and animal carcinogen. Targets nervous system, liver, kidneys, and skin.
Delta-hexachlorocyclohexane	Lung irritation; headache; convulsions.
Dibenz(a,h)anthracene	Probable human carcinogen.
/,2-Dichlorobenzene	Targets liver, kidneys, skin, eyes, and respiratory system.
/,3-Dichlorobenzene	No known health effects.
/,4-Dichlorobenzene	Possible human carcinogen. Targets liver, kidneys, eyes, skin, and respiratory system.
3,3-Dichlorobenzidine	Positive animal carcinogen; probable human carcinogen. May cause dermatitis, and respiratory infection.
/,/-Dichloroethane	Possible human carcinogen. CNS depressant; skin irritant; liver and kidney damage.
/,2-Dichloroethane	Central nervous system (CNS) depressant; digestive system disorders; respiratory and circulatory system damage; known animal carcinogen; suspected animal teratogen.
/,2-Dichloroethene	CNS depressant. May cause kidney and lung damage.
2,4-Dichlorophenol	Mild irritation of tissues and membranes.
Dieldrin	Probable human carcinogen, animal teratogen. Attacks CNS, liver, kidneys, and skin.
Diethyl phthalate	Respiratory, mucous membrane, and dermal irritant.
2,4-Dimethylphenol	Irritation of tissue and mucous membrane.
Di-n-butyl phthalate	Respiratory, mucous membrane, and dermal irritant.
Di-n-octyl phthalate	Suspected animal teratogen.
/,3-DNB (explosive)	Probable human carcinogen. Targets CNS.
Endosulfan	Central nervous system damage.
Endrin	Probable human carcinogen, animal teratogen. Targets CNS and liver.
Ethyl benzene	Renal and hepatic disorders. Chronic respiratory and dermal disease.
Ethylene	Loss of coordination, unconsciousness, convulsions and paralysis. Targets eyes, skin, respiratory system, and CNS.
Ethylene dibromide	Proven animal carcinogen. Targets eyes, skin, respiratory system, liver, kidneys, and reproductive system.
Fluoranthene	Animal co-carcinogen.
Heptachlor	Positive animal carcinogen, probable human carcinogen. Targets CNS and liver
Heptachlor epoxide	Probable human carcinogen. Targets CNS and liver.
Hexachlorobenzene	May cause weight loss, enlargement of the thyroid, skin sores, and discoloration.
Hexachlorophene	Proven animal carcinogen.
Indeno(1,2,3-cd)Pyrene	Probable human carcinogen. No known short term health effects at this time.
Isophorone	Possible human carcinogen. Central nervous system depressant; dermal and mucous membrane irritant.
Lead	Probable human carcinogen. Digestive system discomfort; muscular system weakness; CNS damage; affects blood and liver.
Lindane (Gamma- hexachlorocyclohexane)	Probable human carcinogen. Targets eyes, skin, respiratory system, blood, liver, kidneys, and CNS.
Manganese	Targets respiratory system, CNS, blood, lungs, kidneys; known animal teratogen.
Mercury	Targets CNS, kidneys, respiratory tract, skin, and gingival tissue. May cause changes in vision and hearing, memory loss and tremors.
Methoxychlor	CNS depressant, nausea, headache.

Methylene Chloride	Probable human carcinogen and known animal carcinogen. May cause cardiovascular irregularities; CNS depressant.
Naphthalene	Vision loss; bladder irritation; erythrocyte destruction.
Nickel	Animal carcinogen, suspected animal teratogen, and suspected human carcinogen.CNS
P-chloro-m-cresol	depressant; respiratory system damage; liver and kidney effects. Insufficient data.
Pentachlorophenol	Probable human carcinogen. Irritation to skin, eyes, respiratory system; possible damage to liver
Phenanthrene	and kidney. Suspected animal carcinogen. Targets skin, bladder, kidneys, and respiratory system.
Phenol	Skin and eye damage; affects the digestive system, CNS, liver, and kidneys.
Polychlorinated biphenyls	Animal carcinogen; probable human carcinogen; hepatotoxin and embryotoxin.
Polycyclic Aromatic Hydrocarbons (PAHs)	Some are positive animal carcinogens and probable human carcinogens.
Pyrene	Known animal , suspected human carcinogen. Targets skin, bladder, kidneys, and respiratory system.
Radium	*
RDX (explosive) /,3,5-trinitro-/,3,5-triazine	Probable human carcinogen. CNS effects, such as seizures; nausea and vomiting.
Selenium	Liver and kidney damage.
Sodium	Increases blood pressure.
Styrene	Possible human carcinogen. Irritant to eyes, skin, and respiratory system. CNS depressant. Animal carcinogen.
2,4,5-T	Weakness, malaise, loss of appetite, and heart failure.
2,3,7,8-Tetrachlorodibenzo-paradioxin (2,3,7,8-TCDD, or Dioxin)	Chloracne; thymic atrophy; liver damage. Suspected to cause soft tissue sarcoma, Non-Hodgkin's Lymphoma, porphyria cutanea tarda, and Hodgkin's disease.
/,/,2,2-Tetrachloroethane	Possible human carcinogen. Targets CNS, blood, liver, and kidneys.
Tetrachloroethylene (PCE)	Probable human carcinogen and positive animal carcinogen. Hepatotoxin; renal injury and CNS depressant.
Thimet	Targets CNS, eyes, skin, and CNS.
Thorium	Known human carcinogen. Series effects include lung, pancreas, and bone cancer.
Toluene	CNS depressant; liver and kidney damage.
Toxaphene	Known animal carcinogen; targets the skin and CNS.
/,/,-Trichloroethane	Known animal carcinogen; CNS depressant, targets the liver and kidneys.
/,/,2-Trichloroethane	Possible human carcinogen. CNS depressant,and skin irritant.
Trichloroethylene (TCE)	Animal carcinogen and probable human carcinogen. CNS depressant; renal and hepatic damage. Suspected increased risk of congenital heart defects in children of older women of child bearing age.
Trifluralin (Treflan)	Possible human carcinogen.
Uranium	Known human carcinogen. Series effects may include kidney damage, lung cancer, osteosarcoma, and lymphoma.
Vinyl chloride	Known human carcinogen; CNS depressant.
Xylenes	CNS depressant; liver and kidney damage.
Zinc	Some forms may be carcinogenic and/or affect the peripheral nervous system. All may cause gastrointestinal distress.

* A secondary associated risk is due to the decay product radon (radon-222 and radon-220), and its short-lived daughters. The primary hazard associated with radon arises from the inhalation of its short-lived decay products, which are charged ions that readily attach to dust particles. These particles can be inhaled into the lungs and deposited on the mucous lining of the respiratory tract, potentially leading to lung cancer;

APPENDIX B GLOSSARY OF HEALTH TERMS

GLOSSARY OF HEALTH TERMS

acnegenic

Producing or increasing the severity of acne.

aplastic anemia

A rare but extremely serious disorder that results from the unexplained failure of the bone marrow to produce blood cells.

carcinogenic or carcinogen

Capable of causing cancer. A suspected carcinogen is a substance that may cause cancer in humans or animals but for which the evidence is not conclusive.

central nervous system (CNS)

Brain and spinal cord.

chloracne

A rare acne-like skin condition caused by exposure to herbicides or chlorinated chemicals, including the dioxins. It develops a few months after swallowing, inhaling or touching the responsible agent.

cholinesterase

An enzyme produced in the liver that is required for normal nervous function.

conjunctiva

The membrane that lines the eyelids and covers the white part, or sclera, of the eyeball. When an individual has conjunctivitis, the reflection of the inflamed conjunctiva makes the white of the eye appear red.

cutaneous

Of, relating to, or affecting the skin.

embryotoxicity and fetotoxicity

Any toxic effect on the embryo (embryotoxicity) or fetus (fetotoxicity) as a result of prenatal exposure to a substance that crosses the placental barrier. The distinguishing feature between the two terms is the stage of development during which the insult occurs. Toxic effects can include malformations and variations, altered growth, and in utero death.

fetotoxicity

See "embryotoxicity."

genotoxicity

Damaging to DNA or pertaining to agents (radiation or chemical substances) known to damage DNA, thereby causing mutations or cancer.

gingival tissue

Gum tissue.

hepatic

Of, relating to, affecting, or associated with the liver.

Hodgkin's disease

One of the two basic types of lymphoma, Hodgkin's is a cancer that develops in the lymphatic system, the part of the body's circulatory system that helps fight disease and infection.

hyperpigmentation

An increase in the natural color of the skin.

hyporeflexia

Underactivity of bodily reflexes.

immunity

The ability of an organism to resist disease or toxins by natural or artificial means.

immunogenic

Producing immunity or evoking an immune response. An immunological effect is the production of a functional change in the immune response. Immunologic toxicity causes the occurrence of adverse effects on the immune system and may result from exposure to environmental agents such as chemicals.

keratosis

A disease of the skin marked by growth of scaly tissue.

lymphoma

Any of various malignant tumors that arise in the lymph nodes or in other lymphoid tissue.

mesothelioma

A malignant tumor of the mesothelium. The mesothelium is the thin lining on the surface of the body cavities and the organs that are contained within them.

morbidity

The rate of incidence of a disease.

mutagen

A substance that causes mutations. A mutation is a change in the DNA sequence contained in a cell. Mutations can lead to birth defects, miscarriages, or cancer.

mutagenic

Causing alteration in the DNA (genes or chromosomes) of an organism.

natality

The ratio of total live births to total population in a specified area over a specified period of time; birthrate.

narcosis

A condition of deep stupor or unconsciousness produced by a drug or other chemical substance.

non-Hodgkins lymphoma

A group of malignancies, with differing patterns of behavior and responses to treatment, in which cancer (malignant) cells are found in the lymph system.

osteosarcoma

A sarcoma derived from bone or containing bone tissue; also called osteogenic sarcoma.

peripheral neuritis

General classification of disorders involving damage or destruction of nerves, not including the nerves of the brain or spinal cord (CNS).

pneumonitis

A disease characterized by inflammation of the lungs.

porphyria cutanea tarda

The most common form of porphyria, causes blistering of skin exposed to sunlight. Porphyrias are a group of disorders caused by deficiencies of enzymes involved in the synthesis of heme, a chemical compound that carries oxygen and makes blood red.

pulmonary edema

A condition in which fluid accumulates in the lungs, usually because the heart's left ventricle does not pump adequately.

renal

Relating to, involving, affecting, or located in the region of the kidneys.

sarcoma

Cancerous growth of the soft tissues.

teratogenic

Capable of causing abnormal development of the embryo and congenital malformations.

teratogenicity

The ability or tendency to produce anomalies of formation.

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APPENDIX C MISSOURI HAZARDOUS WASTE MANAGEMENT LAW (Selected Sections)

A complete version of the Missouri Revised Statutes Chapter 260, Environmental Control, is available at the Missouri General Assembly's Web address: www.moga.state.mo.us/statutes/c260.htm.

Missouri Revised Statutes Chapter 260 Environmental Control Hazardous Waste Management Selected Sections

August 28, 2013

Section 260.350-Short title.

Sections 260.350 to 260.430 shall be known and may be cited as the "Missouri Hazardous Waste Management Law".

(L. 1977 H.B. 318 § 1)

Section 260.355-Exempted wastes.

Exempted from the provisions of sections 260.350 to 260.480 are:

- (1) Radioactive wastes regulated under section 2011, et seq., of title 42 of United States Code;
- (2) Emissions to the air subject to regulation of and which are regulated by the Missouri air conservation commission pursuant to chapter 643, RSMo;
- (3) Discharges to the waters of this state pursuant to a permit issued by the Missouri clean water commission pursuant to chapter 204, RSMo;
- (4) Fluids injected or returned into subsurface formations in connection with oil or gas operations regulated by the Missouri oil and gas council pursuant to chapter 259, RSMo;
- (5) Mining wastes used in reclamation of mined lands pursuant to a permit issued by the Missouri land reclamation commission pursuant to chapter 444, RSMo.

(L. 1977 H.B. 318 § 2, A.L. 1985 S.B. 110)

Effective 6-27-85

Section 260.360-Definitions.

When used in sections 260.350 to 260.430 and in standards, rules and regulations adopted pursuant to sections 260.350 to 260.430, the following words and phrases mean:

- (1) "Cleanup", all actions necessary to contain, collect, control, treat, disburse, remove or dispose of a hazardous waste:
- (2) "Commission", the hazardous waste management commission of the state of Missouri created by sections 260.350 to 260.430;
- (3) "Conference, conciliation and persuasion", a process of verbal or written communications consisting of meetings, reports, correspondence or telephone conferences between authorized representatives of the department and the alleged violator. The process shall, at a minimum, consist of one offer to meet with the alleged violator tendered by the department. During any such meeting, the department and the alleged violator shall negotiate in good faith to eliminate the alleged violation and shall attempt to agree upon a plan to achieve compliance;
- (4) "Department", the Missouri department of natural resources;
- (5) "Detonation", an explosion in which chemical transformation passes through the material faster than the speed of sound, which is 0.33 kilometers per second at sea level;
- (6) "Director", the director of the Missouri department of natural resources;
- (7) "Disposal", the discharge, deposit, injection, dumping, spilling, leaking, or placing of any waste

into or on any land or water so that such waste, or any constituent thereof, may enter the environment or be emitted into the air or be discharged into the waters, including groundwaters;

- (8) "Final disposition", the location, time and method by which hazardous waste loses its identity or enters the environment, including, but not limited to, disposal, resource recovery and treatment;
- (9) "Generation", the act or process of producing waste;
- (10) "Generator", any person who produces waste;
- (11) "Hazardous waste", any waste or combination of wastes, as determined by the commission by rules and regulations, which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may cause or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness, or pose a present or potential threat to the health of humans or the environment;
- (12) "Hazardous waste facility", any property that is intended or used for hazardous waste management including, but not limited to, storage, treatment and disposal sites;
- (13) "Hazardous waste management", the systematic recognition and control of hazardous waste from generation to final disposition including, but not limited to, its identification, containerization, labeling, storage, collection, transfer or transportation, treatment, resource recovery or disposal;
- (14) "Infectious waste", waste in quantities and characteristics as determined by the department by rule and regulation, including the following wastes known or suspected to be infectious: isolation wastes, cultures and stocks of etiologic agents, contaminated blood and blood products, other contaminated surgical wastes, wastes from autopsy, contaminated laboratory wastes, sharps, dialysis unit wastes, discarded biologicals and antineoplastic chemotherapeutic materials; provided, however, that infectious waste does not mean waste treated to department specifications;
- (15) "Manifest", a department form accompanying hazardous waste from point of generation, through transport, to final disposition;
- (16) "Minor violation", a violation which possesses a small potential to harm the environment or human health or cause pollution, was not knowingly committed, and is not defined by the United States Environmental Protection Agency as other than minor;
- (17)"Person", an individual, partnership, copartnership, firm, company, public or private corporation, association, joint stock company, trust, estate, political subdivision or any agency, board, department or bureau of the state or federal government or any other legal entity whatever which is recognized by law as the subject of rights and duties:
- (18) "Plasma arc technology", a process that converts electrical energy into thermal energy. The plasma arc is created when a voltage is established between two points:
- (19) "Resource recovery", the reclamation of energy or materials from waste, its reuse or its transformation into new products which are not wastes;
- (20) "Storage", the containment or holding of waste at a designated location in such manner or for such a period of time, as determined in regulations adopted hereunder, so as not to constitute disposal of such waste;
- (21) "Treatment", the processing of waste to remove or reduce its harmful properties or to contribute to more efficient or less costly management or to enhance its potential for resource recovery including, but not limited to, existing or future procedures for biodegradation, concentration, reduction in volume, detoxification, fixation, incineration or neutralization;
- (22) "Waste", any material for which no use or sale is intended and which will be discarded or any material which has been or is being discarded. "Waste" shall also include certain residual materials, to be specified by the rules and regulations, which may be sold for purposes of energy or materials reclamation, reuse or transformation into new products which are not wastes;
- (23) "Waste explosives", any waste which has the potential to detonate, or any bulk military propellant which cannot be safely disposed of through other modes of treatment.

(L. 1977 H.B. 318 § 3, A.L. 1980 2d Ex. Sess. H.B. 5, et al., A.L. 1985 S.B. 110, A.L. 1986 H.B. 875 & 1649, A.L. 1987 H.B. 375, A.L. 1993 S.B. 80, et al., A.L. 2007 S.B. 54)

Effective 1-01-08

Section 260.365-Hazardous waste management commission created--composition, qualifications--compensation--terms--meetings, notice required, quorum.

- 1. There is hereby created a hazardous waste management agency to be known as the "Hazardous Waste Management Commission of the State of Missouri", whose domicile for the purpose of sections 260.350 to 260.430 shall be deemed to be that of the department of natural resources of the state of Missouri. The commission shall consist of seven members appointed by the governor with the advice and consent of the senate. No more than four members shall belong to the same political party. All members shall be representative of the general interest of the public and shall have an interest in and knowledge of waste management and the effects of improper waste management on health and the environment and shall serve in a manner consistent with the purposes of sections 260.350 to 260.430. Three of the members, but no more than three, one for each interest, shall be knowledgeable of and may be employed in agriculture, the waste generating industry and the waste management industry. Except for the industry members, no member shall receive, or have received during the previous two years, a significant portion of income directly or indirectly from any license or permit holder or applicant for license or permit under any waste management act. At the first meeting of the commission and annually thereafter, the members shall select from among themselves a chairman and a vice chairman. Prior to any vote on any variance, appeal or order, they shall adopt a voting rule to exclude from such vote any member with a conflict of interest with respect to the matter at issue.
- 2. The members' terms of office shall be four years and until their successors are selected and qualified, except that, of those first appointed, three shall have a term of three years, two shall have a term of two years and two shall have a term of one year as designated by the governor at the time of appointment. There is no limitation on the number of terms any appointed member may serve. If a vacancy occurs the governor may appoint a member for the remaining portion of the unexpired term created by the vacancy. The governor may remove any appointed member for cause. The members of the commission shall be reimbursed for actual and necessary expenses incurred in the performance of their duties, and shall receive fifty dollars per day for each day spent in the performance of their official duties while in attendance at regular commission meetings.
- 3. The commission shall hold at least four regular meetings each year and such additional meetings as the chairman deems desirable at a place and time to be fixed by the chairman. Special meetings may be called by three members of the commission upon delivery of written notice to each member of the commission. Reasonable written notice of all meetings shall be given by the department to all members of the commission. Four members of the commission shall constitute a quorum. All powers and duties conferred upon members of the commission shall be exercised personally by the members and not by alternates or representatives. All actions of the commission shall be taken at meetings open to the public. Any member absent from four consecutive regular commission meetings for any cause whatsoever shall be deemed to have resigned and the vacancy shall be filled immediately in accordance with this section.

(L. 1977 H.B. 318 § 4, A.L. 1980 2d Ex. Sess. H.B. 5, et al., A.L. 2013 H.B. 28 merged with H.B. 650)

Effective 8-28-13 (H.B. 28)

10-11-13 (H.B. 650)

 * H.B. 650 effective 10-11-13, see § 21.250. H.B. 650 was vetoed July 12, 2013. The veto was overridden on September 11, 2013.

CROSS REFERENCE:

Fee for transportation of hazardous waste, used oil, or infectious waste, amount to be established by Missouri hazardous waste management commission, 226.008

Section 260.370-Duties and powers of commission--rules and regulations to be adopted, procedures--inspection fees, use of, refund, when--variances granted, when.

- 1. Where proven technology is available and the economic impact is reasonable, pursuant to rules and regulations promulgated by the commission, the hazardous waste management commission shall encourage that every effort is made to effectively treat, recycle, detoxify, incinerate or otherwise treat hazardous waste to be disposed of in the state of Missouri in order that such wastes are not disposed of in a manner which is hazardous to the public health and the environment. Where proven technology is available with respect to a specific hazardous waste and the economic impact is reasonable, pursuant to rules and regulations promulgated by the commission, the hazardous waste management commission shall direct that disposal of the specific hazardous wastes using land filling as the primary method is prohibited.
- 2. The hazardous waste management commission shall, by rules and regulations, categorize hazardous waste by taking into account toxicity, persistence and degradability in nature, potential for accumulation in tissue, and other related factors such as flammability, corrosiveness and other hazardous characteristics. The commission shall by rules and regulations further establish within each category the wastes which may or may not be disposed of through alternative hazardous waste management technologies including, but not limited to, treatment facilities, incinerators, landfills, landfarms, storage facilities, surface impoundments, recycling, reuse and reduction. The commission shall specify, by rule and regulation, the frequency of inspection for each method of hazardous waste management and for the different waste categories at hazardous waste management sites. The inspection may be daily when the hazardous waste management commission deems it necessary. The hazardous waste management commission shall specify, by rule, fees to be paid to the department by owners or operators of hazardous waste facilities who have obtained, or are required to obtain, a hazardous waste facility permit and who accept, on a commercial basis for remuneration, hazardous waste from off-site sources, but not including wastes generated by the same person at other sites located in Missouri or within a metropolitan statistical area located partially in Missouri and owned or operated by the same person and transferred to the hazardous waste facility, for treatment, storage or disposal, for inspections conducted by the department to determine compliance with sections 260.350 to 260.430 and the regulations promulgated thereunder. Funds derived from these inspection fees shall be used for the purpose of funding the inspection of hazardous waste facilities, as specified in subsection 3 of section 260.391. Such fees shall not exceed twelve thousand dollars per year per facility and the commission shall establish a graduated fee scale based on the volume of hazardous waste accepted with reduced fees for facilities accepting smaller volumes of hazardous waste. The department shall furnish, upon request, to the person, firm or corporation operating the hazardous waste facility a complete, full and detailed accounting of the cost of the department's inspections of the facility for the twelve-month period immediately preceding the request within fortyfive days after receipt of the request. Failure to provide the accounting within forty-five days shall require the department to refund the inspection fee paid during the twelve-month-time period. 3. In addition to any other powers vested in it by law, the commission shall have the following
- (1) From time to time adopt, amend or repeal, after due notice and public hearing, standards, rules and regulations to implement, enforce and carry out the provisions of sections 260.350 to 260.430 and any required of this state by any federal hazardous waste management act and as the commission may deem necessary to provide for the safe management of hazardous wastes to protect the health of humans and the environment. In implementing this subsection, the commission shall consider the variations within this state in climate, geology, population density, quantities and types of hazardous wastes generated, availability of hazardous waste facilities and such other factors as may be relevant to the safe management of hazardous wastes. Within two years after September 28, 1977, the commission shall adopt rules and regulations including the following:
- (a) Rules and regulations establishing criteria and a listing for the determination of whether any waste or combination of wastes is hazardous for the purposes of sections 260.350 to 260.430, taking into account toxicity, persistence and degradability in nature, potential for accumulation in tissue, and other related factors such as flammability, corrosiveness and other hazardous characteristics;
- (b) Rules and regulations for the storage, treatment and disposal of hazardous wastes;

- (c) Rules and regulations for the transportation, containerization and labeling of hazardous wastes, which shall be consistent with those issued by the Missouri public service commission;
- (d) Rules and regulations establishing standards for the issuance, modification, suspension, revocation or denial of such licenses and permits as are consistent with the purposes of sections 260.350 to 260.430:
- (e) Rules and regulations establishing standards and procedures for the safe operation and maintenance of hazardous waste facilities in order to protect the health of humans and other living organisms;
- (f) Rules and regulations listing those wastes or combinations of wastes, for which criteria have been established under paragraph (a) of this subdivision and which are not compatible and which may not be stored or disposed of together;
- (g) Rules and regulations establishing procedures and requirements for the reporting of the generation, storage, transportation, treatment or disposal of hazardous wastes;
- (2) Adopt and publish, after notice as required by the provisions of chapter 536, RSMo, pertaining to administrative rulemaking, and public hearing, a state hazardous waste management plan to provide for the safe and effective management of hazardous wastes within this state. This plan shall be adopted within two years after September 28, 1977, and revised at least once every five years thereafter:
- (3) Hold hearings, issue notices of hearings and subpoenas requiring the attendance of witnesses and the production of evidence, administer oaths and take testimony as the commission deems necessary to accomplish the purposes of sections 260.350 to 260.430 or as required by any federal hazardous waste management act. Unless otherwise specified in sections 260.350 to 260.430, any of these powers may be exercised on behalf of the commission by any members thereof or a hearing officer designated by it;
- (4) Grant individual variances in accordance with the provisions of sections 260.350 to 260.430;
- (5) Make such orders as are necessary to implement, enforce and effectuate the powers, duties and purposes of sections 260.350 to 260.430.
- 4. No rule or portion of a rule promulgated under the authority of sections 260.350 to 260.480 and sections 260.565 to 260.575 shall become effective unless it has been promulgated pursuant to the provisions of section 536.024, RSMo.
- 5.To the extent there is a conflict concerning authority for risk-based remediation rules between this section and section 644.143 or subdivision (8) of section 644.026, this section shall prevail.

(L. 1977 H.B. 318 § 5, A.L. 1980 2d Ex. Sess. H.B. 5, et al., A.L. 1988 S.B. 535, A.L. 1993 S.B. 52 merged with S.B. 80, et al., A.L. 1995 S.B. 3, A.L. 2004 S.B. 901 merged with S.B. 1040, A.L. 2010 H.B. 1965

Section 260.371-Severability clause, exceptions.

The provisions of this act* are severable, except as otherwise provided in sections 260.225 and 260.370. If any provision of this act* is found by a court of competent jurisdiction to be invalid or unconstitutional, the remaining provisions of this act shall remain in full force and effect.

(L. 1988 S.B. 535 § 3)

Effective 5-3-88

*"This act" (S.B. 535, 1988) contained numerous sections. Consult Disposition of Sections table for a definitive listing.

Section 260.372-Powers and duties of commission.

1. The Missouri hazardous waste management commission within the Missouri department of natural resources is hereby given the authority to aid in the promotion of hazardous waste recycling, reuse, or reduction by entering into contracts, subject to appropriations, for the development and implementation of projects dealing with said uses of hazardous wastes or the purchase and development of machinery, equipment, appliances, devices, and supplies solely required to develop and operate hazardous waste recycling, reuse, and reduction projects.

- 2. The hazardous waste management commission within the Missouri department of natural resources shall promulgate rules and regulations to establish or participate in one or more regional waste exchange clearing houses where generators of wastes may list those wastes that have market value or other use.
- 3. The hazardous waste management commission within the Missouri department of natural resources shall act in an advisory capacity to Missouri's member on the midwest low-level radioactive waste compact commission, review activities of the midwest low-level radioactive waste compact commission and midwest interstate radioactive waste compact states, and present recommendations in writing to the governor and the general assembly as requested or as necessary to insure adequate exchange of information.

(L. 1980 2d Ex. Sess. H.B. 5, et al., A.L. 2011 H.B. 464)

Section 260.400-Procedure for conducting public hearings.

- 1. At public hearings on variances or appeals of decisions hereunder, all hazardous waste facilities and hazardous waste generators who are involved in such hearings shall have an appropriate person present. All testimony taken before the commission shall be under oath and recorded stenographically. The transcript so recorded, upon payment of the usual charge therefor, shall be made available to any member of the public, the respondent or party to a hearing on a complaint, any party to a hearing on a petition for variance or any party appealing any order or determination of the department or commission.
- 2. In any hearing, any member of the commission or the hearing officer shall issue in the name of the commission notice of hearing and subpoenas and shall be authorized to require that testimony before such hearing be given under oath. Subpoenas shall be issued and enforced as provided in section 536.077, RSMo. The rules of discovery that apply in any civil case shall apply to hearings held by the commission.
- 3. All hearings to adopt standards, rules and regulations, or to adopt the state hazardous waste management plan shall be held before at least four members of the commission. All other hearings may be held before one commission member designated by the commission chairman or by a hearing officer who shall be a member of the Missouri bar and shall be appointed by the commission chairman. The hearing officer or commission member shall preside at the hearing and hear all evidence and rule on the admissibility of evidence. The hearing officer or commission member shall make recommended findings of fact and may make recommended conclusions of law to the commission.
- 4. All final orders or determinations or other final actions by the commission shall be approved in writing by at least four members of the commission. Any commission member approving in writing any final action of the commission, who did not attend the hearing, shall do so only after reviewing all exhibits and reading the entire transcript.
- 5. The following requirements shall apply to the adoption, amendment and repeal of standards, rules and regulations:
- (1) No standard, rule or regulation or any amendment or repeal thereof shall be adopted except after a public hearing to be held after thirty days prior notice as required by the provisions of chapter 536, RSMo, pertaining to administrative rulemaking and by press release or public advertisement containing the date, time and place of the hearing and opportunity given to the public to be heard; (2) At the hearing, opportunity to be heard by the commission with respect to the subject thereof shall be afforded any interested person upon written request to the commission, addressed to the department, not later than seven days prior to the hearing, and may be afforded to other persons if convenient. In addition, any interested persons, whether or not heard, may submit, within seven days subsequent to the hearings, a written statement of their views. The commission may solicit the views, in writing, of persons who may be affected by, knowledgeable concerning or interested in proposed standards, rules and regulations, the state hazardous waste management plan or any license, permit or variance. Any person heard or represented at the hearing or making written request for notice shall be given written notice of the action of the commission with respect to the

subject thereof;

(3) Any standard, rule or regulation, amendment or repeal thereof or state hazardous waste management plan shall not be deemed adopted or in force until it has been approved in writing by at least four members of the commission.

(L. 1977 H.B. 318 § 11, A.L. 1980 2d Ex. Sess. H.B. 5, et al., A.L. 1993 S.B. 52)

Section 260.435-Definitions, sections 260.435 to 260.480--definition of hazardous waste not to include certain materials.

The definitions set forth in section 260.360 shall apply to sections 260.435 to 260.480 and, in addition to such definitions, the term "abandoned or uncontrolled" means any property where hazardous waste has been illegally disposed of, or where hazardous waste was disposed of prior to regulation under sections 260.350 to 260.430. However, the term "hazardous waste" as used in sections 260.350 to 260.480 shall not include:

- (1) Fly ash waste, bottom ash waste, slag waste and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels;
- (2) Solid waste from the extraction, beneficiation and processing of ores and minerals, including phosphate rock and overburden from the mining of uranium ore; or
- (3) Cement kiln dust waste; unless any such waste becomes subject to regulation under the Federal Hazardous Waste Management Act, then such waste excluded under this section shall be subject to regulation under this act*.

(L. 1983 H.B. 528) Effective 6-27-83

*"This act" (H.B. 528, 1983) contained numerous sections. Consult Disposition of Sections table for a definitive listing.

Section 260.437-Rules and regulations, authority.

In addition to any other powers vested in it by law, the commission shall have the power to adopt, amend or repeal, after due notice and public hearing, standards, rules and regulations to implement sections 260.435 to 260.480.

(L. 1983 H.B. 528, A.L. 1995 S.B. 3)

Section 260.440-Registry of abandoned or uncontrolled hazardous waste sites, contents--investigation--department's powers and duties.

- 1. The department shall maintain and make available for public inspection a registry of confirmed abandoned or uncontrolled hazardous waste disposal sites in the state. The department shall take all necessary action to insure that the registry provides a complete listing of all such sites. The registry shall contain the exact location of each site and identify the types of waste found at each site.
- 2. The department shall investigate all known or suspected abandoned or uncontrolled sites and determine whether each site should be included in the registry. In the evaluation of known or suspected abandoned or uncontrolled sites, the department shall have the power to enter private property and perform tests and analyses in the manner provided in section 260.375.

(L. 1983 H.B. 528)

Effective 6-27-83

Section 260.445-Abandoned and uncontrolled sites, annual report, content--sent to whom.

- 1. The department shall, on or before January 1, 1984, and annually thereafter on January first of each succeeding year, transmit an updated report to the commission, the general assembly and the governor identifying every abandoned or uncontrolled hazardous waste disposal site in the state listed on the registry. A copy of such report shall also be sent to the governing body of every county containing such a site.
- 2. Each annual report shall include, but need not be limited to, the following information for each site:
- (1) A general description of the site, including the name and address of the site, the type and quantity of the hazardous waste disposed of at the site and the name of the current owners of the site:
- (2) A summary of any significant environmental problems at and near the site;
- (3) A summary of any serious health problems in the immediate vicinity of the site and any health problems deemed by the department to be related to conditions at the site;
- (4) The status of any testing, monitoring or remedial actions in progress or recommended by the department;
- (5) The status of any pending legal actions and any federal, state or local government permits concerning the site;
- (6) The relative priority for remedial action at each site; and
- (7) The proximity of the site to private residences, public buildings or property, school facilities, places of work or other areas where individuals may be regularly present.
- 3. In developing and maintaining the annual report, the department shall assess by January 1, 1984, and reassess by January first of each year thereafter based upon new information received, the relative priority of the need for action at each site to remedy environmental and health problems resulting from the presence of hazardous wastes at such sites. In making its assessments of relative priority, the department shall place every site in one of the following classifications:
- (1) Causing or presenting an imminent danger of causing irreversible or irreparable damage to the public health or environment--immediate action required;
- (2) Significant threat to the environment--action required:
- (3) Does not present a significant threat to the public health or environment--action may be deferred;
- (4) Site properly closed--requires continued management:
- (5) Site properly closed, no evidence of present or potential adverse impact--no further action required.
- 4. Any site classified as properly closed under subdivision (5) of subsection 3 of this section shall be removed from all subsequent annual reports and the register of abandoned or uncontrolled sites.
- 5. The department shall utilize the department of health and senior services when assessing the effects of an abandoned or uncontrolled site on human health.

(L. 1983 H.B. 528)

Effective 6-27-83

Section 260.450-Priority of sites, listed in registry, determined by investigation -- factors to be considered.

- 1. The director shall investigate each site listed in the registry to determine the relative priority of the site as provided in section 260.445.
- 2. The director shall for each site identify the:
- (1) Address and site boundaries;
- (2) Time period of use for disposal of hazardous waste;
- (3) Name of the current owner and operator and names of reported owners and operators during the time period of use for disposal of hazardous waste;
- (4) Names of persons responsible for the generation and transportation of hazardous waste

disposed of; and

- (5) Type, quantity and manner of hazardous waste disposal.
- 3. When preliminary evidence suggests further assessment is necessary, the director may assess the:
- (1) Depth of water table at the site;
- (2) Nature of soils at the site;
- (3) Location, nature and size of aquifers at the site;
- (4) Direction of present and historic groundwater flows at the site;
- (5) Location and nature of surface waters at and near the site;
- (6) Levels of contaminants, if any, in groundwater, surface water, air and soils at and near the site resulting from hazardous wastes disposed of at the site; and
- (7) Current quality of all drinking water drawn from or distributed through the area in which the site is located, if the department determines that water quality may have been affected by the site.
- 4. The director shall maintain a site assessment file for each site listed in the registry. The file shall contain all information obtained pursuant to this section and shall be open to the public. The site materials in the file may be reproduced by any person. The department may impose a charge not to exceed the actual cost of reproduction for copies of file information.

(L. 1983 H.B. 528) Effective 6-27-83

Section 260.455-Registry, proposed site addition, procedure, notice.

Within sixty days after June 27, 1983, the department shall notify by certified mail the owner of all or any part of each site or area to be included in the registry required by section 260.440 by mailing notice to the owner's last known address. Thereafter, thirty days before any site is added to the registry, the department shall notify the owner of all or any part of such site by certified mail of the proposed addition to the registry by mailing notice to each such owner at the owner's last known address.

(L. 1983 H.B. 528) Effective 6-27-83

Section 260.460-Listing or proposed listing of site in registry, procedure to remove.

- 1. Any owner or operator of a site proposed for listing in the registry, or listed in the registry pursuant to section 260.440, may petition the director for deletion of such site, modification of the site classification or modification of any information regarding such site. No site shall be listed on the registry until after the resolution of any appeal initiated under this section.
- 2. Within ninety days after the submittal of such petition, the commission may convene a hearing to review the action of the director. No less than thirty days prior to the hearing, the commission shall cause a notice of hearing to be published in a newspaper of general circulation in the county in which the site is located. The commission shall also notify in writing any owner or operator of the site no less than thirty days prior to the hearing.
- 3. No later than thirty days following receipt of the complete record or following the decision not to hold a hearing, the commission shall provide the owner or operator with a written determination accompanied by reason therefor regarding action taken on the petition. All final decisions of the commission shall be reviewable under chapter 536, RSMo.
- 4. The department shall, within ten days of any determination, notify the local governments of jurisdiction whenever a change is made in the registry pursuant to this section.

(L. 1983 H.B. 528)

Effective 6-27-83

Section 260.465-Change of use or transfer of site property--notice to buyer--appeal --violations, penalty.

- 1. No person may substantially change the manner in which an abandoned or uncontrolled hazardous waste disposal site on the registry prepared and maintained by the department pursuant to section 260.440 is used without the written approval of the director.
- 2. No person may sell, convey or transfer title to an abandoned or uncontrolled hazardous waste disposal site which is on the registry prepared and maintained by the department pursuant to section 260.440 without disclosing to the buyer early in the negotiation process that the site is on the registry, specifying applicable use restrictions and providing all registry information for the site. The seller shall also notify the buyer that he may be assuming liability for any remedial action at the site; provided, however, the sale, conveyance or transfer of property shall not absolve any person responsible for site contamination, including the seller, of liability for any remedial action at the site. The seller shall notify the department of the transfer of ownership within thirty days after the transfer.
- 3. Decisions of the director concerning the use of an abandoned or uncontrolled hazardous waste site may be appealed to the commission in the manner provided in section 260.460.
- 4. If the department has reason to believe that the provisions of this section have been violated, or are in imminent danger of being violated, it may institute a civil action in any court of competent jurisdiction for injunctive relief to prevent such violation and for the assessment of a civil penalty not to exceed one thousand dollars per day for each day of violation.

(L. 1983 H.B. 528, A.L. 1988 S.B. 535)

Section 260.470-Recording of sites, placed on or removed from registry.

- 1. When the director places a site on the registry as provided in section 260.440, and after the resolution of any appeal under section 260.455, he shall file with the county recorder of deeds the period during which the site was used as a hazardous waste disposal area. When the director finds that a site on the registry has been properly closed under subdivision (5) of subsection 3 of section 260.445 with no evidence of potential adverse impact, he shall file this finding with the county recorder of deeds. The county recorder of deeds shall file this information so that any purchaser will be given notice that the site has been placed on, or removed from, the registry.
- 2. Any owner of a registry site may petition the department to remove the site from the registry provided that:
- (1) Corrective actions have addressed the contamination at the site in accordance with a department -approved risk-based corrective action plan;
- (2) The department has issued a letter indicating that no further actions are required to address current risk from contaminants for the site; and
- (3) An environmental covenant for the property that meets the requirements of sections 260.1000 to 260.1039 has been filed with the county recorder of deeds.
- 3. The department shall approve such a request unless the department determines that removal from the registry would result in significant current or future risk of harm to human health, public welfare, or the environment. In making such a determination, the department shall provide a written justification that considers the amount, toxicity, and persistence of any contaminants left in place and the stability of current site conditions. Any denial under this subsection may be appealed to the commission in the manner provided in section 260.460.

(L. 1983 H.B. 528, A.L. 2007 S.B. 54)

Effective 1-01-08

Section 260.475-Fees to be paid by hazardous waste generators--exceptions--fee distribution--violations, penalty--deposit--fee requirement, expiration.

- 260.475. 1. Every hazardous waste generator shall pay, in addition to the fees imposed in section 260.380, a fee of twenty-five dollars per ton annually on all hazardous waste which is discharged, deposited, dumped or placed into or on the soil as a final action, and two dollars per ton on all other hazardous waste transported off site. No fee shall be imposed upon any hazardous waste generator who registers less than ten tons of hazardous waste annually pursuant to section 260.380, or upon:
- (1) Hazardous waste which must be disposed of as provided by a remedial plan for an abandoned or uncontrolled hazardous waste site;
- (2) Fly ash waste, bottom ash waste, slag waste and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels;
- (3) Solid waste from the extraction, beneficiation and processing of ores and minerals, including phosphate rock and overburden from the mining of uranium ore and smelter slag waste from the processing of materials into reclaimed metals;
- (4) Cement kiln dust waste;
- (5) Waste oil; or
- (6) Hazardous waste that is:
- (a) Reclaimed or reused for energy and materials;
- (b) Transformed into new products which are not wastes;
- (c) Destroyed or treated to render the hazardous waste nonhazardous; or
- (d) Waste discharged to a publicly owned treatment works.
- 2. The fees imposed in this section shall be reported and paid to the department on an annual basis not later than the first of January. The payment shall be accompanied by a return in such form as the department may prescribe.
- 3. Sixty percent of all moneys collected or received by the department pursuant to this section shall be transmitted to the department of revenue for deposit in the state treasury to the credit of the hazardous waste remedial fund created in section 260.480. Forty percent of all moneys collected or received by the department pursuant to this section shall be transmitted to the department of revenue for deposit in the state treasury to the credit of the hazardous waste fund created pursuant to section 260.391. Following each annual reporting date, the state treasurer shall certify the amount deposited in the fund to the commission.
- 4. If any generator or transporter fails or refuses to pay the fees imposed by this section, or fails or refuses to furnish any information reasonably requested by the department relating to such fees, there shall be imposed, in addition to the fee determined to be owed, a penalty of fifteen percent of the fee, sixty percent of which shall be deposited in the hazardous waste remedial fund, and forty percent of which shall be deposited in the hazardous waste fund.
- 5. If the fees or any portion of the fees imposed by this section are not paid by the date prescribed for such payment, there shall be imposed interest upon the unpaid amount at the rate of ten percent per annum from the date prescribed for its payment until payment is actually made, sixty percent of which shall be deposited in the hazardous waste remedial fund, forty percent of which shall be deposited in the hazardous waste fund.
- 6. The state treasurer is authorized to deposit all of the moneys in the hazardous waste fund in any of the qualified depositories of the state. All such deposits shall be secured in such a manner and shall be made upon such terms and conditions as are now or may hereafter be provided for by law relative to state deposits. Interest received on such deposits shall be credited to the hazardous waste fund.
- **7. This fee shall expire December 31, 2018, except that the department shall levy and collect this fee for any hazardous waste generated prior to such date and reported to the department.
- ***8. The director of the department of natural resources may conduct a comprehensive review of the fee structure set forth in this section. The comprehensive review shall include stakeholder meetings in order to solicit stakeholder input from each of the following groups: cement kiln representatives, chemical companies, large and small hazardous waste generators, and any other interested parties. Upon completion of the comprehensive review, the department shall submit proposed changes to the fee structure with stakeholder agreement to the hazardous waste

management commission. The commission shall, upon receiving the department's recommendations, review such recommendations at the forthcoming regular or special meeting. The commission shall not take a vote on the fee structure until the following regular meeting. If the commission approves, by vote of two-thirds majority, the hazardous waste fee structure recommendations, the commission shall promulgate by regulation and publish the recommended fee structure no later than October first of the same year. The commission shall file the order of rulemaking for such rule with the joint committee on administrative rules pursuant to sections 536.021 and 536.024 no later than December first of the same year. If such rules are not disapproved by the general assembly in the manner set out below, they shall take effect on January first of the next odd-numbered year and the fee structure set out in this section shall expire upon the effective date of the commission-adopted fee structure, contrary to subsection 7**** of this section. Any regulation promulgated under this subsection shall be deemed to be beyond the scope and authority provided in this subsection, or detrimental to permit applicants, if the general assembly, within the first sixty calendar days of the regular session immediately following the promulgation of such regulation, by concurrent resolution, shall disapprove the fee structure contained in such regulation. If the general assembly so disapproves any regulation promulgated under this subsection, the hazardous waste management commission shall continue to use the fee structure set forth in the most recent preceding regulation promulgated under this subsection. This subsection shall expire on August 28, 2023.

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(L. 1983 H.B. 528, A.L. 1985 S.B. 110, A.L. 1988 S.B. 535, A.L. 1994 H.B. 1156, A.L. 1999 S.B. 353, A.L. 2000 S.B. 577, A.L. 2004 S.B. 1040, A.L. 2005 S.B. 225, A.L. 2011 S.B. 135, A.L. 2013 H.B. 28 merged with H.B. 650) Effective 8-28-13 (H.B. 28)

10-11-13 (H.B. 650)

*H.B. 650 effective 10-11-13, see § 21.250. H.B. 650 was vetoed July 12, 2013. The veto was overridden on September 11, 2013.

**Fee expires 12-31-18

***Subsection 8 expires 8-28-23

****Number "9" appears in original rolls.
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Section 260.480-Transfer of moneys in the hazardous waste remedial fund to hazardous waste fund.

The fund balance remaining in the hazardous waste remedial fund is hereby transferred to the hazardous waste fund created in section 260.391*, and the moneys may be appropriated for any purpose previously authorized by this section as specified in subsection 1 of section 260.391.

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(L. 1983 H.B. 528, A.L. 1985 S.B. 110, A.L. 1988 S.B. 535, A.L. 2000 S.B. 577, A.L. 2005 S.B. 225)
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^{*}Words "section 260.491" appear in original rolls, a typographical error.

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APPENDIX D MISSOURI HAZARDOUS WASTE MANAGEMENT REGULATIONS 10 CSR 25-10.010

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Rules of **Department of Natural Resources**

Division 25—Hazardous Waste Management Commission Chapter 10—Abandoned or Uncontrolled Hazardous Waste Disposal Sites

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Title 10—DEPARTMENT OF NATURAL RESOURCES

Division 25—Hazardous Waste Management Commission Chapter 10—Abandoned or Uncontrolled Hazardous Waste Disposal Sites

10 CSR 25-10.010 Abandoned or Uncontrolled Hazardous Waste Disposal Sites

PURPOSE: This rule establishes procedures for adding sites to, removing sites from and modifying site classifications in the Missouri Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites and establishes procedures to be used by responsible parties to obtain state approval for remedial actions at abandoned or uncontrolled sites.

- (1) Proposing Sites for the Registry.
- (A) When the department proposes to list a site on the registry, it will notify each owner of record of the site of the proposal. Notice shall be given by certified mail directed to the last known address of the person being notified.
- 1. The notice shall contain a general description of the site proposed to be listed on the registry, a general description of the nature of the waste found at the site and a statement that the owner or operator may request a hearing before the commission in accordance with section (2) of this rule regarding the proposal by filing a notice of appeal by certified mail with the director within thirty (30) days of the notice.
- (B) No abandoned or uncontrolled site may be listed on the registry until the notice set forth in this subsection has been given and any timely appeal to the commission has been finally resolved. If an owner or operator does not file a notice of appeal within the time specified in paragraph (1)(A)1. of this rule, the department will list the site on the registry as proposed.

(2) Appeals to the Commission.

(A) Within the ninety (90) days following the filing of a timely notice of appeal, the commission may convene a hearing, or refer the matter to a hearing officer or handle any pretrial matters that comes before it. After hearing, or upon receipt of the recommendation of the hearing officer, and after any briefing or argument of the parties, the commission shall issue its findings of fact, conclusions of law and order affirming, modifying or reversing, in whole or in part, the action or proposed action of the department or director, and giving the appellant any relief warranted under the circumstances.

- 1. In any hearing under this rule, the provisions of sections 260.400.2–260.400.4, RSMo shall apply.
- 2. In any hearing under this rule, any party may move the commission for summary judgment upon the same procedure and terms as in a motion filed pursuant to Rule 74.04, Missouri Rules of Civil Procedure. If the matter has been referred to a hearing officer, the hearing officer shall recommend to the commission a proposed order upon the motion.
- (B) No hearing shall be held under this rule upon less than thirty (30) days' written notice to the appellant. In addition, the department, at least thirty (30) days prior to the hearing, shall publish in a newspaper of general circulation in the county in which the site is located, a notice of the date and place of the hearing.
- (C) The parties to a hearing shall be the appellant, the department and any person who upon proper motion shall be allowed to intervene in the proceeding. The granting or denial of a motion to intervene shall be governed by the considerations set forth in Rule 52.12, Missouri Rules of Civil Procedure. In any matter before a hearing officer, the hearing officer shall rule on any motion to intervene.
- (D) Within ten (10) days after the rendition of any decision by the director or the commission to make any change in the registry, the department will notify by mail the local governments with jurisdiction over the site of any change.
- (E) Opportunity to Allow Responsible Party Cleanups.
- 1. Within thirty (30) days of notice under section (1) of this rule, a responsible party may commit in writing to investigate the site and implement an approved remedial action.
- 2. A consent agreement developed under this section must be signed by the department and the responsible party and must contain, but not be limited to, the following commitments:
- A. A schedule and specific responsibilities for completion of any site investigation and remedial action;
- B. The responsible party will obtain departmental approval before implementation of any remedial action;
- C. The responsible party shall be responsible for off-site migration;
- D. The responsible party shall reimburse the department for all response and oversight costs incurred by the department.
- 3. In the case that either party to the consent agreement refuses or fails to carry out the terms of the agreement, either party

may request a hearing before the commission on the matter to be handled as an appeal to the commission under section (2) of this rule.

- 4. Remedial actions undertaken at a site according to terms of a consent agreement developed under this section must include all necessary actions to achieve a classification pursuant to paragraph (7)(B)5. of this rule in order for the department to withdraw its proposed listing of the site on the registry.
- 5. When the department determines that a remedial action results in a site receiving a classification of 1, 2, 3, or 4 pursuant to subsection (7)(B) of this rule, the department will notify each owner and the party to the consent agreement developed under this section. This notification will be according to procedures established in section (1) of this rule and will include the classification of the site pursuant to subsection (7)(B) of this rule.
- (3) Change of Use or Transfer of Site Property.
- (A) No person may substantially change the manner in which a site listed on the registry is used without the prior written approval of the director.
- 1. Requests for approval for changes in use must be submitted in writing to the director at least sixty (60) days prior to any planned substantial change in use.
- 2. The request must include a detailed site description, a detailed description of the change in use planned and an analysis concerning whether the change in use might result in any of the conditions described in subparagraph (3)(A)4.A. through D. of this rule. Any plans, specifications or designs prepared for the change in use shall be submitted to the director with the request.
- 3. The director will evaluate the request to determine whether the change in use is substantial. If the change in use is not substantial, the director will notify the owner that departmental approval is not required.
- 4. If the director determines that the change in use is a substantial change, the request will be evaluated to determine whether the change in use may result in any of the following:
- A. A spread of contamination over additional portions of the site or off-site;
- B. An increase in human exposure to the hazardous materials;
- C. An increase in adverse environmental impacts; or
- D. A situation making potential remedial actions to correct problems at the site more difficult to undertake or complete.
- 5. Requests for changes in use which may result in conditions described in sub-paragraphs (3)(A)4.A. through D., of this

rule will be denied by the director. Requests which do not result in any of the conditions in subparagraphs (3)(A)4.A. through D., of this rule will be approved.

- (B) No person may sell, convey or transfer title to an abandoned or uncontrolled hazardous waste disposal site which is on the registry prepared and maintained by the department pursuant to section 260.440, RSMo without disclosing to the buyer early in the negotiation process that the site is on the registry.
- 1. Prior to the execution of any contracts for sale, conveyance or transfer of title to a site which is on the registry, the seller shall provide to the buyer a copy of the letter from the department notifying the owner of the department's intent to list the property on the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri.
- 2. Prior to the execution of any contracts for sale, conveyance or transfer of title to a site which is listed on the registry, the seller shall provide to the buyer a copy of the letter from the department notifying the owner that the property has been listed on the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites in Missouri along with any applicable use restrictions and other registry information for the site.
- 3. The seller, within thirty (30) days after the transfer of title, shall notify the department in writing of the transfer. At that time the seller shall also provide to the department a notarized statement signed by the buyer which states that the buyer has received and read the information specified in paragraphs (3)(B)1. and 2. of this rule and that the buyer understands that s/he may be assuming liability for any remedial action at the site; provided, however, the sale, conveyance or transfer of property shall not absolve any person responsible for site contamination, including the seller, of liability for any remedial action at the site.
- (C) Decisions of the director concerning requests for a change in use of a site on the registry may be appealed to the commission. Any appeals filed under this part will be handled according to the procedures in section (2) of this rule.
- (4) Recording of Sites, Listing Them On or Removing Them From the Registry.
- (A) When the director lists a site on the registry as provided in section 260.440, RSMo, s/he shall file with the recorder of deeds of the county where the site, or each portion of the site, is located a notice describing the site so that the notice will appear in the chain of title of the site, and stating the

- period during which the site was used as a hazardous waste disposal site, the hazardous waste(s) for which the site is being listed, and that the site has been listed on the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites. The notice shall be recorded and indexed in the manner which is provided for deeds of real property.
- (B) When the director finds that a site listed on the registry has been properly closed under paragraph (7)(B)5. of this rule, s/he shall file with the county recorder of deeds a notice that the site has been removed from the Registry of Confirmed Abandoned or Uncontrolled Hazardous Waste Disposal Sites. The notice shall describe the site so that the notice will appear in the chain of title of the site and shall be recorded and indexed in the same manner as the notice filed under subsection (4)(A) of this rule.
- (5) Petitions for Deletion From the Registry, Change in Site Classification or Modification of Information.
- (A) The record owner of any portion of a site listed on the registry, or any operator of any portion of the site, may petition the director of the department in writing by certified mail to delete the site from the registry, to modify the site classification or to modify information included in the registry, annual report, site assessment file or filed with the county recorder of deeds. The petitioner shall state the interests of the petitioner in the site and shall state what relief the petitioner is requesting, and shall contain a summary of the factual and legal reasons why the petitioner believes the requested relief is warranted.
- 1. The director shall investigate the matters raised in the petition and shall respond in writing within thirty (30) days to the petitioner, stating his/her decision whether and to what extent the relief requested is or is not granted or shall request information or site accesses pursuant to paragraph (5)(A)2. of this rule. The response shall be sent by certified mail to the address of the petitioner or his/her attorneys as shown on the petition.
- 2. The director may request additional information from the petitioner, and access to the site, in order to evaluate the merits of the petition. Failure to provide the requested information or site access within thirty (30) days shall be grounds for denial of the petition.
- 3. The petitioner may appeal to the commission any decision by the director upon a petition under section (5) of this rule, by filing a written notice of appeal by certified mail with the commission's staff director within thirty (30) days of the director's final

response to the petition. If a timely notice of appeal is not filed under this paragraph, no issue determined by the director adverse to the petitioner may be considered as grounds for relief in any subsequent petition by the same person, or by any person in privity with the person, in any subsequent petition under section (5) of this rule.

- (6) Survey of Sites to Reduce the Area to be Listed or Already Listed on the Registry.
- (A) The owner or a responsible party may submit to the department in writing a commitment to survey the site and reduce the area to be or which has been listed on the registry.
- 1. For sites which have been proposed for listing on the registry, the written commitment to survey the site must be received within thirty (30) days of notice under section (1) of this rule or within thirty (30) days of the commission's decision pursuant to section (2) of this rule. In no event may a survey for this purpose be accepted beyond one hundred twenty (120) days of the department's receipt of written commitment pursuant to subsection (6)(A) of this rule.
- 2. If the owner or a responsible party chooses to reduce the area of the site, a written commitment to do so under subsection (6)(A) of this rule must include the instructions or plan to be given the surveyor describing the area to be surveyed.
- 3. The plan or instructions must be approved by the department prior to implementation.
- The surveyor must install permanent survey markers at the corners of the surveyed area.
- 5. The site must include a one hundred foot (100') minimum buffer zone extending laterally in all directions from the known edge of the contamination, either on or below the ground surface. The dimensions of the buffer zone may be modified upon approval of the department.
- 6. The owner or a responsible party must submit to the department a survey sealed by a land surveyor, who is registered to practice in Missouri and in compliance with the current Minimum Standards for Property Boundary Surveys in 10 CSR 30-2.010 depicting the legal description of the site.
 - (B) (Reserved)
- (7) Site Assessment.
 - (A) Site Assessment Committee.
- 1. A five (5)-member voting committee shall be established with one qualified representative each from the Missouri Department of Health; the department's Division of

Geology and Land Survey; and one (1) representative each from the Division of Environmental Quality's Hazardous Waste Program, Public Drinking Water Program and one (1) other environmental program. Three (3) yes votes are required to initially classify or reclassify a site.

- 2. The committee shall meet at least once annually to assess or reassess the classification of each abandoned or uncontrolled hazardous waste registry site as required in section 260.445.3, RSMo. The classification shall be determined in accordance with criteria contained in subsection (7)(B) of this rule.
- (B) Classifications and Criteria for Determining Site Classifications.
- 1. Class 1—sites that are causing or presenting an imminent danger of causing irreversible or irreparable damage to the public health or environment. Sites present a high risk to public health and/or the environment, and the following criteria for determining this site classification shall apply:
- A. Hazardous waste on the site is highly concentrated and readily accessible by ingestion and/or inhalation and/or dermal contact; and/or
- B. Immediate remediation or action is required to prevent irreparable damage to public health and/or the environment.
- 2. Class 2—sites that are a significant threat to the environment. Sites present a moderate risk to public health and/or the environment, and the following criteria for determining this site classification shall apply:
- A. Hazardous waste on the site exhibits one (1) or more of the following:
- (I) Moderately concentrated and accessible by ingestion and/or inhalation and/or dermal contact;
- (II) Highly concentrated, but not openly accessible due to the nature of the site and the contamination and/or any remedial action taken; and
- (III) Likely to adversely impact human health and/or the environment if not treated.
- B. Remediation or action is required to reduce adverse impacts to public health and/or the environment.
- 3. Class 3—sites that do not present a significant threat to the public health or environment. Sites present a low risk to public health and/or the environment, and the following criteria for determining this site classification shall apply:
- A. Hazardous waste on the site exhibits one (1) or more of the following:
- (I) Low to moderately concentrated and are not readily accessible by ingestion and/or inhalation and/or dermal contact due

to the nature of the site and the contamination and/or any remedial action taken; and

- (II) Exceeding established regulatory guidelines; however, are not significantly impacting public health and/or the environment at this time.
- B. Action may be deferred; however, hazardous waste remains on-site, and remediation is needed.
- 4. Class 4—sites that have been properly closed. All department required response actions have been implemented on the sites, and the response actions have been approved by the department. The following criteria for determining this site classification shall apply:
- A. Hazardous waste remains on-site; and
- B. The site requires continued treatment, containment, or other operation and maintenance until it meets established regulatory guidelines.
- 5. Class 5—sites that have been properly closed with no evidence of present or potential adverse impact. Sites proposed for the registry or on the registry meet all department requirements and regulatory guidelines for a residential or industrial cleanup as defined in subparagraphs (7)(B)5.A. and B. of this rule.
 - A. Residential cleanup.
- (I) A site is remediated to standards determined on a site-specific basis by the department in consultation with the Missouri Department of Health, considering toxicity and typical residential exposure factors which may include years of exposure, body weight, exposure dose and/or other risk factors.
- (II) A site is cleaned up for the hazardous wastes identified and remediated, and the site is not placed on the registry, or may be removed from the registry. A letter may be sent to the landowner authorizing residential use of the site. The county recorder of deeds shall be notified of the removal of a site from the registry.
 - B. Industrial/commercial cleanup.
 - (I) A site is—
- (a) Remediated to standards determined on a site-specific basis by a method approved by the department in consultation with the Department of Health which considers toxicity and typical industrial exposure factors which may include years of exposure, body weight, exposure dose and/or other risk factors;
- (b) Used only for industrial or commercial purposes as long as any remaining hazardous wastes exceed the department's residential or any-use standards; and
- (c) Not a source for off-site releases of contaminants in concentrations

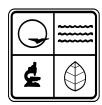
exceeding residential or any-use standards for any media.

- (II) A consent agreement, as defined in subsection (2)(E), shall be signed by the department and the property owner which establishes a schedule and specific responsibilities for completion of a site investigation and remedial action.
 - (a) The property owner shall—
- I. Comply with the terms of the consent agreement; and
- II. Continue to comply with the terms of the consent agreement.
- (b) The consent agreement shall contain the requirement that the property owner file a deed restriction with the recorder of deeds in the county in which the site is located. One (1) or more of the following deed restrictions shall be filed so as to appear on the chain of title for the site, along with any other restrictions specific to the site:
- I. Prohibiting the construction or placement of potable water wells on the property without the approval of the Missouri Department of Natural Resources;
- II. Prohibiting excavation or construction work in areas of known soil contamination without the approval of the Missouri Department of Natural Resources;
- III. Prohibiting the disruption or alteration of a cap, containment system or barrier in an area of known contamination without the approval of the Missouri Department of Natural Resources; and/or
- IV. Prohibiting the property from being used for anything but an industrial use
- (III) The deed restriction and consent agreement are required before a site is withdrawn from the registry, or before a proposal to list a site is withdrawn.
- (IV) The property owner must provide the department with evidence that the property owner has notified the political subdivision exercising jurisdiction over land use planning of the proposed industrial/commercial cleanup level classification.
- (C) When the department proposes to initially classify or reclassify a site on the registry in accordance with criteria contained in subsection (7)(B) of this rule, it will notify each owner of record of the proposed site classification.
- 1. The notice shall contain the classification being proposed by the site assessment committee and a statement that the owner or operator may petition the director of the department in accordance with subsection (5)(A) of this rule and appeal the director's final decision in accordance with section 260.460, RSMo and this rule.

- 2. If an owner or operator does not file a notice of appeal within thirty (30) days of the mailing date of the notice specified in paragraph (7)(C)1. of this rule, the department will classify the site on the registry as proposed.
- 3. No registry classification or reclassification may be made until the notice set forth in subsection (7)(C) of this rule has been mailed, and any appeal to the commission in accordance with section (2) of this rule has been finally resolved.
- 4. Pending petitions or appeals of registered sites pursuant to subsection (5)(A) of this rule will not prevent the site from being listed in the annual report. Appeals to the commission under subsection (5)(A) of this rule will be noted in the annual report.

AUTHORITY: sections 260.370, 260.437, 260.440, 260.445 and 260.455, RSMo Supp. 2000.* Original rule filed Aug. 14, 1984, effective March 1, 1985. Amended: Filed March 28, 1986, effective Oct. 1, 1986. Amended: Filed Sept. 1, 1987, effective Dec. 25, 1987. Amended: Filed Sept. 6, 1988, effective Jan. 1, 1989. Amended: Filed Feb. 16, 1990, effective Dec. 31, 1990. Amended: Filed Jan. 15, 1991, effective Aug. 1, 1991. Amended: Filed June 1, 1998, effective Jan. 30, 1999. Amended: Filed Feb. 1, 2001, effective Oct. 30, 2001.

*Original authority: 260.370, RSMo 1977, amended 1980, 1988, 1993, 1995; 260.437, RSMo 1983, amended 1995; 260.440, RSMo 1983; 260.445, RSMo 1983; and 260.455, RSMo 1983.



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